

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

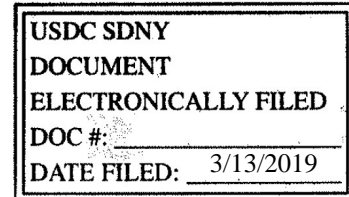
*In re J.P. Morgan Stable Value Fund ERISA
Litigation*

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Master File No. 12-cv-2548-VSB

ORDER

VERNON S. BRODERICK, United States District Judge:



1. On November 3, 2017, Class Counsel filed a Motion for Preliminary Approval of Class Settlement on behalf of certain named plaintiffs (“Settling Plaintiffs”) and the Class. (Doc. 399.)

2. On December 7, 2017, other named plaintiffs (“Objecting Plaintiffs”) filed a Memorandum in Opposition to the Motion for Preliminary Approval. (Doc. 412.)

3. On December 19, 2017, Defendants filed a Response in Support of the Motion for Preliminary Approval, (Doc. 414), and Class Counsel filed a Reply Memorandum in Support of the Motion for Preliminary Approval, (Doc. 416).

4. On January 12, 2018, I held a Motion Hearing at which counsel for the Class, Defendants, and Objecting Plaintiffs appeared and presented arguments regarding Preliminary Approval of the Settlement.

5. On January 19, 2018, I issued an Order granting the Motion for Preliminary Approval of Class Settlement except with regard to the form and manner of the Notice of Settlement. (Doc. 425.) That Order directed the parties to either submit a joint proposed Notice of Settlement to be sent to class members or, if they could not agree on a form of Notice, to submit a joint letter stating their respective positions and proposed language regarding the form of Notice.

6. On January 30, 2018, Class Counsel submitted a letter agreed to by the Settling Parties that proposed a First Amendment to the Class Action Settlement Agreement to facilitate escrow arrangements for the Qualified Settlement Funding, shifting certain tax reporting duties from the “Escrow Agent” to the “Settlement Administrator.” (Doc. 426.) The Objecting Plaintiffs did not object to the proposed First Amendment.

7. On February 13, 2018, the parties submitted (1) a joint proposed publication notice that was agreeable to all parties, (Doc. 431-3), and (2) a joint letter motion stating their respective positions regarding the form of mailed notice to be sent to potential Class Members, (Doc. 431).

8. On August 8, 2018, Class Counsel submitted a letter motion requesting that the Court approve a proposed Second Amendment to the Class Action Settlement Agreement, which would provide for a supplemental notice and claims process for potential Class Members whose necessary contact and investment information no longer exists or is otherwise unavailable for collection. (Doc. 441.) Objecting Plaintiffs do not oppose this proposed Second Amendment or the updated publication notice, provided that the supplemental mailed notice otherwise comports with my ruling on the disputed issues presented in the parties’ February 13, 2018 letter motion, (Doc. 431).

9. On December 7, 2018, the parties submitted a second joint letter motion further clarifying and narrowing the disputed issues regarding the form of mailed notice and attaching a revised draft of same that reflects the parties’ updated positions and proposed alternative language/approaches. (Doc. 442.)

10. The following issue presented in the February 13, 2018 joint letter remains pending:

Must the mailed notice and the settlement website disclose that Objecting Plaintiffs oppose the Settlement, provide contact information for Objecting Plaintiffs' counsel, and require Class Members who file a Notice of Intention to Appear at the Fairness Hearing to directly mail a copy of same to Objecting Plaintiffs' counsel?

Wherefore, having considered all the above-referenced documents and the related arguments presented by counsel before this Court previously, IT IS HEREBY ORDERED that:

- (1) The proposed First Amendment to the Class Action Settlement Agreement, (Doc. 426-1), is approved as proposed by and agreed to by the Settling Parties;
- (2) The proposed Second Amendment to the Class Action Settlement Agreement, (Doc. 441-1), is approved, subject to my ruling below regarding the form of the mailed Notice to potential class members;
- (3) The form of the joint proposed publication notice agreed to by all parties, (Doc. 441-3), is approved; and
- (4) The form of the mailed Notice to all potential Class Members for whom contact information is available is approved as proposed by Class Counsel. The Notice to current participants, notice to former participants, and notice for participants requiring proof of eligibility, as proposed by Class Counsel and reflected in Exhibit A to this Order, may be issued pursuant to the terms of the proposed Settlement Agreement without the redline modifications. In other words, the mailed Notice and the settlement website need not disclose that Objecting Plaintiffs oppose the Settlement Agreement, provide contact information for Objecting Plaintiffs' counsel,

or require Class Members who file a Notice of Intention to Appear at the Fairness Hearing to directly mail a copy of same to Objecting Plaintiffs' counsel.

IT IS FURTHER ORDERED THAT the parties shall adhere to the schedule set forth in Exhibit B setting forth the deadlines for Notice to be provided to the Class and other dates leading to a final Fairness Hearing, which will be held on September 6, 2019 at 11:00 a.m. in Courtroom 518 of the Thurgood Marshall U.S. Courthouse, 40 Foley Square.

SO ORDERED

Dated: March 13, 2019
New York, New York



Vernon S. Broderick
United States District Judge

Exhibit A

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Notice of Class Action Settlement and Fairness Hearing

You have been identified as a participant or beneficiary in your employer's 401(k) retirement savings plan through which you were invested at relevant times in certain JPMorgan stable value funds. You could get a payment from this Class Action Settlement.

The Court has authorized this notice. This is not a solicitation from a lawyer. Neither you nor your retirement plan is being sued.

I. PLEASE READ THIS SETTLEMENT NOTICE CAREFULLY

The purpose of this Notice is to inform you the Court has given its preliminary approval to a proposed settlement (the "Settlement") of a class action brought by certain individuals whose 401(k) plan accounts included investments in the JPMorgan stable value funds. The action is entitled *In re: J.P. Morgan Stable Value Fund ERISA Litigation*, case no. 12-CV-2548 (the "Action"), currently pending before the Honorable Vernon S. Broderick of the United States District Court for the Southern District of New York (the "Court"). The Court has given its preliminary approval to the Settlement. You should read this notice carefully, because your legal rights are affected whether you act or do not act.

The Plaintiffs brought the Action alleging violations of the Employment Retirement Income Security Act ("ERISA") concerning the way Defendants JPMorgan Chase & Co. and other JPMorgan entities ("Defendants" or "JPMorgan") managed the Class Members' 401(k) plan investments that were allocated to certain JPMorgan stable value funds.

JPMorgan denies all claims, and nothing in the Settlement is an admission or concession on JPMorgan's part of any fault or liability whatsoever.

In its March 31, 2017, Memorandum Opinion and Order, the Court certified a class and three subclasses of individuals who were participants or beneficiaries in their employers' 401(k) plans and had some of their investments allocated to a stable value fund managed by JPMorgan during the class periods. (The definition of the class and the class periods is set forth below in Section II, "Definition of the Class.") The names of the 401(k) plans through which Class Members allocated retirement assets to JPMorgan stable value funds are listed in Attachment 1 to this Notice.¹

A. The Settlement

As part of the Settlement, a fund of \$75,000,000 (the "Settlement Amount") has been established to resolve the Action. From that \$75,000,000 will first be paid any administrative expenses, taxes, tax expenses, Court-approved attorneys' fees and costs, Class Representative service awards, and other approved expenses of the litigation. Then, the remaining Settlement Amount (called the "Net Settlement Amount") will be allocated to Class Members according to the Plan of Allocation to be approved by the Court. Shortly after the Court preliminarily approved the Settlement, JPMorgan deposited the \$75,000,000 Settlement Amount in an interest-bearing Qualified Settlement Fund. Upon final approval of the Settlement by the Court, the interest accrued on the Settlement Fund will be added to the Settlement Amount in order to benefit the Class.

The Settlement provides, among other things, for the allocation of monies directly into the individual accounts of Class Members who had an account with a positive balance (an "Active Account") in one of the 401(k) plans that are listed in Attachment 1 as of the most current participant data received by Class Counsel ("Current Participants").

¹ Attachment 1 lists the plans which, according to information available at the time of the Settlement, offered a JPMorgan stable value fund during the class period. The plans identified on Attachment 1 may change based on the subsequent investigation of the parties.

Class members who are entitled to a distribution but who no longer have an “Active Account” in one of the Plans listed in Attachment 1 (“Former Participants”) will receive their allocation by check mailed to their last known address or by rollover if available and elected.

Our records indicate that you are a Current Participant. You do not have to do anything to participate in the Settlement or to receive a payment from the Settlement if it is determined that you are entitled to one under the Plan of Allocation.

B. Statement of Attorneys’ Fees and Costs in the Class Action

Co-Lead Class Counsel, and the firms assisting them, have devoted many hours to bringing this case and pursuing it for the past five-and-a-half years. During that time, they also have advanced costs for expert consulting services, substantial investigation, intensive document analysis, and other costs necessary to pursue the case. Co-Lead Class Counsel’s motion for class certification was granted by the Court on March 31, 2017. Co-Lead Class Counsel successfully defended JPMorgan’s petition for an immediate appeal of the Class Certification Order, which the Second Circuit denied. Co-Lead Class Counsel engaged in substantial investigation and analysis of the law and facts concerning the Action in opposing JPMorgan’s motion for summary judgment. This work resulted in the monetary benefits provided in the Settlement. Co-Lead Class Counsel took the risk of litigation and have not been paid for any of their time or reimbursed for any of the costs that they have incurred during the more than five years that the Action has been pending before the Court. Co-Lead Class Counsel also have agreed to undertake the additional risk of paying some of the administrative costs of the settlement process if the Settlement is not approved.

Co-Lead Class Counsel will apply to the Court for payment of attorneys’ fees and costs for their work in the case. Co-Lead Class Counsel will request fees not to exceed one-third of the \$75,000,000 Settlement Amount and will request reimbursement of litigation costs not to exceed

\$1,750,000. Any attorneys' fees and costs awarded by the Court to Co-Lead Class Counsel will be paid from the Qualified Settlement Fund. Co-Lead Class Counsel will not seek to receive any interest earned by the Qualified Settlement Fund, which will be added to the Net Settlement Amount.

As is customary in class action cases in which the Class Representatives have spent time and effort on the litigation, Co-Lead Class Counsel also will ask the Court to approve Service Award payments, not to exceed \$20,000, for each of the 12 Class Representatives who took on the risk of litigation, provided discovery, and committed to spend the time necessary to bring the case to conclusion. Their activities also included assisting in the factual development of the Action.

II. DEFINITION OF THE CLASS

You are deemed to be part of the Class and a participant in this Action if you fit into one or more of the class or subclass definitions below, unless you expressly exclude yourself from the Class in writing. (See answer to Question No. 8 below.)

By order dated March 31, 2017, the Court certified this case to proceed on behalf of a class defined as follows:

All participants of ERISA plans, as well as beneficiaries of those plans, who were invested directly or indirectly in any JPM Stable Value Fund that invested in the JPM Intermediate Bond Fund and/or the Intermediate Public Bond Fund between January 1, 2009 and December 31, 2010 and whose stable value fund investment performance underperformed the Hueler index or similar objective benchmark. Excluded from the Class are the jurists to whom this case is assigned, as well as their respective staffs; counsel who appear in this case, as well as their respective staffs, including experts they employ; the Defendants in this matter, as well as their officers and directors; any person, firm, trust, corporation, officer, director, or other individual or entity in which a Defendant has a controlling interest or that is related to or affiliated with any of the Defendants; and the legal representatives, agents, affiliates, heirs, successors-in-interest, or assigns of any such excluded party.

In addition, the Court certified three subclasses. The first certified subclass—the "SAIF Subclass"—is defined as follows:

All participants of ERISA plans, as well as beneficiaries of those plans, who were invested directly or indirectly in the JPM Stable Asset Income Fund (“SAIF”) from between January 1, 2009 and December 31, 2010 and whose stable value fund investment underperformed the Hueler Index or similar objective benchmark. Excluded from the Class are the jurists to whom this case is assigned, as well as their respective staffs; counsel who appear in this case, as well as their respective staffs, including experts they employ; the Defendants in this matter, as well as their officers and directors; any person, firm, trust, corporation, officer, director, or other individual or entity in which a Defendant has a controlling interest or that is related to or affiliated with any of the Defendants; and the legal representatives, agents, affiliates, heirs, successors-in-interest, or assigns of any such excluded party.

The second certified subclass—the “ACSAF/JP Morgan Stable Value Fund Subclass”—has a class period that begins on September 17, 2007. The ACSAF/JP Morgan Stable Value Fund Subclass is defined as follows:

All participants of ERISA plans, as well as beneficiaries of those plans, who were invested directly or indirectly in the American Century Stable Asset Fund [(“ACSAF”)] immediately before JPMAM took over the Fund and received its assets in the ACSAF/JPM Stable Value Fund on or about September 17, 2007 and continuing to December 31, 2010, and whose stable value fund investment underperformed the Hueler Index or similar objective benchmark. Excluded from the class are the jurists to whom this case is assigned, as well as their respective staffs; counsel who appear in this case, as well as their respective staffs, including experts they employ; the Defendants in this matter, as well as their officers and directors; any person, firm, trust, corporation, officer, director, or other individual or entity in which a Defendant has a controlling interest or that is related to or affiliated with any of the Defendants; and the legal representatives, agents, affiliates, heirs, successors-in-interest, or assigns of any such excluded party.

The third certified subclass—the “Caterpillar Subclass”—is defined as follows:

All participants of the Caterpillar Plan, as well as beneficiaries of those plans, who were invested directly or indirectly in JPM’s Caterpillar Stable Principal Fund or any other JPM Stable Value Fund that invested in the Intermediate Bond Fund and / or the Intermediate Public Bond Fund between January 1, 2009 and December 31, 2010 and whose stable value fund investment performance underperformed the Hueler index or similar objective benchmark. Excluded from the class are the jurists to whom this case is assigned, as well as their respective staffs; counsel who appear in this case, as well as their respective staffs, including experts they employ; the Defendants in this matter, as well as their officers and directors; any person, firm, trust, corporation, officer, director, or other individual or entity in which a Defendant has a controlling interest or that is related to or affiliated with any of the

Defendants; and the legal representatives, agents, affiliates, heirs, successors-in-interest, or assigns of any such excluded party.

The “objective benchmark” referenced in each of these definitions will be the Lehman Brothers Intermediate Aggregate Index (later renamed the Barclays Intermediate Aggregate Index) (hereafter the “Lehman/Barclays Intermediate Aggregate Index” or the “Benchmark”).

1. Why Did I Receive This Settlement Notice?

You received this Notice because records from the record keeper for your 401(k) plan show that you were a participant or beneficiary in a 401(k) plan and that your 401(k) plan account included investments in a JPMorgan stable value fund, and you otherwise may be part of the Class or one of the Subclasses, as explained above.

2. What Is The Class Action About?

In this Class Action, Plaintiffs principally allege that Defendants violated ERISA in two fundamental ways. First, Plaintiffs allege that JPMorgan managed Plaintiffs’ investments imprudently in violation of JPMorgan’s fiduciary duties, by causing its stable value funds to invest heavily in two other JPMorgan funds, the Intermediate Bond Fund (“IBF”) and the Intermediate Public Bond Fund (“IPBF”), which, in turn, invested in risky, highly leveraged assets, including, among other things, mortgage-related assets. Second, Plaintiffs allege that certain Defendants, as fiduciaries for the relevant plans and their participants and beneficiaries, breached their obligations under ERISA to comply with the duties of prudence and diversification and to discharge their duties solely in the interests of plan participants and beneficiaries, and for the exclusive purpose of providing benefits to the plan participants and beneficiaries. Plaintiffs also claim that certain Defendants engaged in transactions prohibited by ERISA, and the ACSAF/JPM Stable Value Fund Subclass Plaintiffs make additional claims against all Defendants for engaging in transactions prohibited by ERISA.

While none of the Plaintiffs or Class Members lost any of the money they invested in JPMorgan stable value funds, the Plaintiffs alleged that they were damaged because the investment return paid to Class Members would have been greater if the funds had been prudently managed.

Defendants have denied and continue to deny the claims and contentions of the Class Representatives. Defendants deny that they are liable at all to the Class, and that the Class has suffered any harm or damage for which Defendants could or should be held responsible. Nothing in the Settlement Agreement is an admission or concession on Defendants’ part of any fault or liability whatsoever.

3. Why Is There A Settlement?

The Court has not reached a final decision on the merits of the Class Representatives’ claims. Instead, a majority of the Class Representatives (the “Settling Class Representatives”) and

Defendants have agreed to the Settlement. The Settlement is the product of extensive negotiations between Co-Lead Class Counsel and Defendants' counsel and an in-person mediation session with a private mediator, followed by months of further negotiation. The parties to the Settlement have taken into account the uncertainty and risks of litigation and have concluded that it is desirable to settle on the terms and conditions set forth in the Settlement Agreement.

[Objectors' Proposal - Four of the twelve Class Representatives do not approve of the settlement. Those four Class Representatives are represented by Philip Greenfield and Kirk May, German May PC, 1201 Walnut Street, 20th Floor, Kansas City, MO, 816-471-7700, www.germanmay.com.]

4. What Does The Settlement Provide?

The Net Settlement Amount will be allocated to Class Members according to a Plan of Allocation to be approved by the Court. Class Members fall into two categories: Current Participants and Former Participants, as defined on pages 2-3 above. Allocations to Current Participants who are entitled to a distribution under the Plan of Allocation will be made into their existing plan accounts in accord with their current investment elections. Allocations to Former Participants who are entitled to a distribution under the Plan of Allocation will be made by check mailed to their last known address or, if available and they so elect, as a rollover to a qualified retirement account.

In return for payment to the Class of the \$75,000,000 Settlement Amount, all Class Members will fully release the Defendants and the Released Parties from the Released Claims. The Released Parties include Defendants, any related entities, as well as any past attorneys and agents. The Released Claims include (but are not limited to) the following:

- All claims that were or could have been asserted in the Action, or that did or could arise out of the conduct alleged in the complaints filed in the Action.
- All claims that relate to any JPMorgan stable value fund investments, the holdings of any stable value fund investments, or disclosures regarding any stable value investments.
- All claims that relate to the direction to calculate, the calculation of, and/or the method or manner of allocation of the Net Settlement Fund pursuant to the Plan of Allocation.

This is only a summary of the Released Parties and Released Claims and is not a binding description of either. The governing releases are found within the Settlement Agreement at www.jpmsvfcassaction.com. Generally, the release means that Class Members will not have the right to sue the Defendants or related parties for conduct during the Class Period arising out of or relating to the allegations in the Action.

The entire Settlement Agreement is available at www.jpmsvfcassaction.com.

5. How Much Will My Distribution Be?

Because you are a Current Participant, the amount, if any, that will be allocated to you will be based upon records maintained by your employer's 401(k) plan's record keeper. Calculations regarding the individual distributions will be performed by the Settlement Administrator, whose determinations will be final and binding, pursuant to the Court-approved Plan of Allocation.

To be eligible for a distribution from the Net Settlement Amount, you must either be: (1) a member of the Class or one of the Subclasses, as defined in Section II above; or (2) a beneficiary, alternate payee, or attorney-in-fact of persons identified in (1) or (2). Former Participants are required to submit a complete and satisfactory Claim Form by the deadline. **Because you are a Current Participant, you do not need to do anything to receive your share of the Settlement.**

Under the proposed Plan of Allocation, the Net Settlement Amount will be divided among all Class Members based upon the underperformance, if any, of each Class Member's JPMorgan stable value investment compared to the Lehman/Barclays Intermediate Aggregate Index. At the Fairness Hearing, the Court will be asked to approve this calculation process as part of the Plan of Allocation.

To make this allocation, the Settlement Administrator will first calculate the Individual Underperformance Amounts by comparing the underperformance, if any, of the JPM Stable Value Funds by comparing the crediting rate of the Plans the participants invested in, with a crediting rate derived from the Benchmark. If the calculation shows that a Plan did not experience any underperformance compared to the Benchmark then the participants in those Plans are not by definition Class Members because they did not suffer from any underperformance damages. For those Plans that experienced underperformance the second step will be for the Settlement Administrator to calculate the Individual Underperformance Amounts as the total dollar value amount by which each participant's individual investment in JPM Stable Value Funds underperformed the Benchmark during the relevant time periods. The specific method for calculating these amounts is detailed in the Settlement Agreement's Plan of Allocation. The sum of all Individual Underperformance Amounts is defined to be the "Total Underperformance Amount."

Once the Underperformance Amounts have been calculated, each Class Member's payment will be calculated by multiplying the Net Settlement Amount by the ratio of that Class Member's Individual Underperformance Amount to the Total Underperformance Amount. This will allow each individual Class Member to receive an allocation from the Net Settlement Amount proportional to the underperformance of his or her stable value investment compared with the underperformance of other Class Members' investments (all other things being equal). Plan of Allocation examples are available on the website, www.jpmsvfcclassaction.com.

Class Counsel and the Settlement Administrator must review information from your 401(k) plan account to determine whether your investments in JPMorgan stable value funds underperformed as compared to the Benchmark. Any information Class Counsel obtains will be treated confidentially under the Protective Order entered by the Court in this Action and will be used

solely for purposes of determining if you are a Class Member entitled to payment under the terms of the Settlement.

6. How Can I Receive My Distribution?

Whether you need to submit a claim form to receive your distribution depends on whether you are considered a “Current Participant” or a “Former Participant.” **According to your Plan’s record keeper, you are a Current Participant. Therefore, you do not need to do anything to receive your share of the Settlement.**

7. When Will I Receive My Distribution?

The timing of the distribution of the Net Settlement Amount is conditioned on several events, including the Court’s final approval of the Settlement and that approval being no longer subject to any appeal in any court. If there is an appeal of the final approval, it may take several years to resolve and the distribution of the Net Settlement Amount will be delayed until that process is complete. If the Settlement is approved by the Court, and there are no appeals, distribution of the Net Settlement Amount likely will occur in 2019.

Separately, there are provisions in the Settlement Agreement that allow the parties to terminate the Settlement under specific conditions. There will be no payments under the Settlement if the Settlement Agreement is terminated.

There will be no payment to you if the Settlement Administrator determines that your individual JPMorgan stable value investment did not suffer any Underperformance Amount when measured against the Benchmark.

If the amount you are allocated is less than the amount of the reasonable direct costs of processing and delivering your payment, then no distribution will be made to you. For example, if your allocation is less than \$5 and the reasonable direct costs of processing the payment and delivery are greater than \$5, you would not be eligible to receive any payment under the Settlement.

8. Can I Get Out Of The Settlement?

Yes, you have the right to exclude yourself from the Class and give up the right to your share of the Settlement Amount. Note: if you exclude yourself from the Class, you may not have a right to bring your own lawsuit due to ERISA’s six-year statute of repose. Class Counsel is of the opinion that ERISA’s six-year statute of repose bars you from bringing your own lawsuit. You may consult your own lawyer to get advice on this issue at your own expense.

If you ask to be excluded, you won’t have a right to receive a payment from the Settlement. You will also not be bound by any judgment of the Court or the terms of the Settlement Agreement, including the release of your potential claims. However, under the United States Supreme Court’s ruling in *California Public Employees’ Retirement System v. ANZ Securities Inc.*, No. 16-373, 582

U.S. ___ (2017), your rights to prosecute any individual claims against the Defendants arising out of these transactions may have already expired due to ERISA's six-year statute of repose.

To ask to be excluded from this proceeding, you must send an "Exclusion Request" by letter, expressly stating that you want to be excluded from the Class in *In re: J.P. Morgan Stable Value Fund ERISA Litigation*. Be sure to include your name and address, and sign the letter. You must mail your Exclusion Request, postmarked by Month 00, 0000, to the Settlement Administrator at the following address:

JPM Stable Value Fund Litigation
c/o JND Class Action Administration
P.O. Box 91304
Seattle, WA 98111

9. Do I Have A Lawyer In The Case?

The Court has appointed The Law Offices of Michael M. Mulder and Schneider Wallace Cottrell Konecky Wotkins LLP to represent the Class as Co-Lead Class Counsel. Co-Lead Class Counsel are working jointly with and being assisted by the law firms of Levin Papantonio Thomas Mitchell Rafferty & Proctor, P.A.; and Peiffer Rosca Wolf Abdullah Carr & Kane, APLC. If you want to be represented by your own lawyer, you may hire one at your own expense.

10. How Will The Lawyers Be Paid?

Co-Lead Class Counsel will file a petition for the award of attorneys' fees and costs. This petition will be considered at the Fairness Hearing. Co-Lead Class Counsel has agreed to limit their application for an award of attorneys' fees and costs to not more than \$25,000,000 in fees and \$1,750,000 in costs. The Court will determine what fees and costs will be approved.

11. How Do I Tell The Court If I Don't Like The Settlement?

If you are a Class Member, you can tell the Court that you do not agree with the Settlement or some part of it. To object, you must send the Court a written statement that you object to the Settlement in *In re: J.P. Morgan Stable Value Fund ERISA Litigation*, Case No. 12-cv-02548. Be sure to include your name, address, telephone number, signature, and a full explanation of why you object to the Settlement. Your written objection must be mailed to each of the following addressees and received by the Court no later than XXXXXXXX, 2019.

THE COURT	CLASS COUNSEL	<u>[Objectors' Proposal – COUNSEL FOR FOUR CLASS REPRESENTATIVES]</u>
Clerk of the Court United States District Court Southern District of New York, Daniel Patrick Moynihan United States Court House 500 Pearl Street, New York, New York 10007	Schneider Wallace Cottrell Konecky Wotkyns LLP Attn: JPM Stable Value Fund ERISA Litigation 2000 Powell Street, Suite 1400 Emeryville, California 94608 counsel@jpmsvfcassaction.com Tel: 1-844-877-5925	<u>German May PC</u> <u>1201 Walnut Street</u> <u>20th Floor</u> <u>Kansas City, MO 64106</u> <u>Attn: JPM Stable Value Fund</u> <u>ERISA Litigation]</u>

12. When And Where Will The Court Decide Whether To Approve The Settlement?

The Court will hold a Fairness Hearing at the U.S. District Court, 500 Pearl Street, New York, NY 10007. The Court has not yet scheduled the specific day and time of that hearing, but under the terms of the Settlement Agreement, it will occur after _____, 20___. When the Fairness Hearing is scheduled by the Court, information regarding the hearing will be posted on the website for the Settlement at www.jpmsvfcassaction.com.

At the Fairness Hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are objections by Class Members, the Court will consider them. After the Fairness Hearing, the Court will decide whether to give its final approval to the Settlement. The Court also will consider the petition for Class Counsel's attorneys' fees and costs and any service awards to Class Representatives.

13. Do I Have To Attend The Fairness Hearing?

No, but you are welcome to come at your own expense. If you send an objection, you do not have to come to the Court to talk about it. As long as you have timely objected, the Court will consider it when the Court considers whether to approve the Settlement as fair, reasonable and adequate. You also may pay your own lawyer to attend the Fairness Hearing, but such attendance is not necessary.

14. May I Speak At The Fairness Hearing?

If you are a Class Member, you may ask the Court for permission to speak at the Fairness Hearing. To do so, you must send a letter or other paper called a "Notice of Intention to Appear at Fairness

Hearing in *In re: J.P. Morgan Stable Value Fund ERISA Litigation*, Case No. 12-cv-02548.” Be sure to include your name, address, telephone number, and your signature. Your Notice of Intention to Appear must be mailed to Class Counsel [\[Objectors’ Proposal -and Counsel For Four Class Representatives\]](#) and filed with the Clerk of the Court no later than **XXXXX, 2019**. (Your notice must be mailed to each of the addressees listed in the answer to Question No. 11).

Please note that only Class Members may speak at the Fairness Hearing. If you have chosen to exclude yourself from the Settlement, you are no longer a member of the Settlement Class and may not speak at the Fairness Hearing.

15. What Happens If I Do Nothing At All?

If you are a Class Member and you do nothing, you will be bound by the Settlement as described above in this Settlement Notice if the Settlement is finally approved. (See the answer to Question No. 6.)

16. How Do I Get More Information?

This Settlement Notice does not fully describe all of the claims, defenses, or contentions of the parties. If you have questions about this Notice or the Action, please do not contact the Court. If you have questions regarding the Settlement, you can call Class Counsel at 1-844-877-5925, email Class Counsel at counsel@jpmsvfclassaction.com, [\[Objectors’ Proposal - call Counsel For Four Class Representatives at 816-471-7700, email Counsel For Four Class Representatives at philg@germanmay.com or kirkm@germanmay.com,\]](#) call the Settlement Administrator at 1-844-877-5911, write to the Settlement Administrator at JPM Stable Value Fund Litigation c/o JND Class Action Administration, P.O. Box 91304, Seattle, WA 98111, or go to the following website: www.jpmsvfclassaction.com where you will find the Court’s order certifying the Class, the Plaintiffs’ Consolidated and Amended Complaint, the Defendants’ Answer to the Consolidated and Amended Complaint, the Settlement Agreement, and information regarding the day, time, and location of the Fairness Hearing once it has been scheduled by the Court. Other filings with the Court and information regarding the Settlement are also available online [\[Objectors’ Proposal - or from the counsel noted above.\]](#).

Dated: _____, 2018

BY THE ORDER OF THE UNITED STATES
DISTRICT COURT FOR THE SOUTHERN
DISTRICT OF NEW YORK

ATTACHMENT 1

	PLAN SPONSOR
1	1888 MILLS, LLC
2	A.A. ANDERSON CO., INC.
3	ABILENE CHAMBER OF COMMERCE
4	ABITIBI CONSOLIDATED SALES CORPORATION
5	ACCE BENEFIT TRUST
6	ACCE BENEFITS TRUST
7	ACCE BENEFITS TRUST 401(K) PLAN
8	ADVANCED MEDICAL OPTICS, INC.
9	AGGREKO, LLC
10	AJAX PAVING INDUSTRIES OF FLORIDA, INC.
11	AJAX PAVING INDUSTRIES, INC.
12	ALASKA TANKER COMPANY ATC
13	ALCON LABS
14	ALLERGAN INC
15	ALM MEDIA INC.
16	ANCHOR ACQUISITION, LLC
17	AMARILLO CHAMBER OF COMMERCE
18	AMERICAN CHAMBER OF COMMERCE EXECUTIVES
19	AMERICAN CIVIL CONSTRUCTORS, INC.
20	AMERICAN LIGHTING ASSOCIATION
21	AMERICAN ROYAL ASSOCIATION
22	AMERICAN TECHNOLOGIES, INC.
23	ALLIANT ENERGY CORPORATE SERVICES, INC.
24	AMERICAN ELECTRIC POWER SERVICE CORP. (AEP)
25	ANDERSEN CORP.
26	ANDREW CORP.
27	ANGELO'S AGGREGATE MATERIALS, LTD.
28	ANNA TRUCKING L.L.C.
29	APAC PAPER & PACKAGING CORP.
30	ARBOR MANAGEMENT, INC.
31	ARCH CHEMICAL INC.
32	AREA ENERGY & ELECTRIC, INC.
33	ARGO GROUP US
34	ARIZONA CHEMICAL COMPANY
35	ARLINGTON METALS CORPORATION
36	ASPHALT PAVING, INC.
37	ASSOCIATED WHOLESALE GROCERS, INC.
38	ASTEC INDUSTRIES, INC.

	PLAN SPONSOR
39	ASTELLAS US LLC
40	ATLANTIC SOUTHEAST AIRLINES, INC
41	AUDIO AUTHORITY CORPORATION
42	AUGUSTA NEWSPRINT COMPANY
43	AVON PRODUCTS, INC.
44	B.F. GOODRICH / GOODRICH / UNITED TECHNOLOGIES CORPORATION (UTC)
45	BADGERLAND SUPPLY. INC.
46	BAESMAN PRINTING CORPORATION
47	BANK OF COMMERCE & TRUST COMPANY
48	BATON ROUGE AREA CHAMBER PROFIT SHARING PLAN
49	BECHTEL JACOBS COMPANY LLC
50	BECK TOYOTA CORP.
51	BEECHMONT PRESS, LLC
52	BELK INC.
53	BELL CORP.
54	BEMIS COMPANY, INC.
55	BENESYS, INC.
56	BERNARD, CASSISA, ELLIOTT AND DAVIS APLC
57	BEST BUY
58	BIGSTON CORPORATION
59	BIOMEDICAL RESEARCH FOUNDATION
60	BISON GEAR ENG. CORP
61	BOC EDWARDS, INC.
62	BOISE CONVENTION & VISITORS BUREAU PROFIT
63	BOISE METRO CHAMBER OF COMMERCE
64	BOSE CORP.
65	BRIGGS AND MORGAN P.A.
66	BRIGGS & STRATTON CORPORATION
67	BROCK MCVEY COMPANY
68	BROOK FURNITURE RENTAL INC.
69	BROOKSHIRE HOLDINGS, INC.
70	BROWN AND CALDWELL
71	BUCKEYE PIPE LINE SERVICES COMPANY
72	BUNN-O-MATIC CORPORATION
73	C.J. ENTERPRISES
74	CANBERRA OAK RIDGE, LLC
75	CARATRON INDUSTRIES, INC.
76	CARGILL INC.
77	CARL ZEISS VISION INC.
78	CARR INDUSTRIES, INC.
79	CARTER MACHINERY CO.

	PLAN SPONSOR
80	CATERPILLAR INC.
81	CDM FEDERAL SERVICES, INC.
82	CELANESE (HOECHST CELANESE)
83	CENTRALIZED LABORATORY SERVICES INC
84	CERNER CORP.
85	CHATTANOOGA AREA CHAMBER OF COMMERCE
86	CHRISTIAN REFORMED CHURCH IN NORTH AMERICA
87	CINCINNATI TOOL STEEL COMPANY
88	CJ HUGHES CONSTRUCTION COMPANY
89	CLARIAN HEALTH / INDIANA UNIV. HEALTH INC.
90	CLASEN QUALITY COATINGS, INC.
91	CLEAR LAKE AREA CHAMBER OF COMMERCE
92	COLE HARDWOOD INC.
93	COLLINS & AIKMAN PRODUCTS CO.
94	COLONIAL PIPELINE CO.
95	COMMODORE ADVANCE SCIENCES, INC.
96	COMSYS IT PARTNERS INC.
97	CONNING & COMPANY
98	COOK COMPOSITES & POLYMERS COMPANY
99	COOPERATIVE REGIONS OF ORGANIC PRODUCER POOLS COOPERATIVE, INC.
100	CROWN EQUIPMENT CORP.
101	CSK AUTO, INC.
102	CUMMINS INC.
103	CUSHMAN & WAKEFIELD, INC.
104	DACO INCORPORATED
105	DAKOTA CLINIC / INNOVIS HEALTH
106	DALLAS REGIONAL CHAMBER
107	DASCO PRO INC.
108	DETROIT LEGAL NEWS COMPANY
109	DICK BARKER INC.
110	DIRECT GENERAL CORPORATION
111	DON R. FRUCHEY, INC.
112	DONOHUE COMPANIES INC.
113	DOTT INDUSTRIES, INC.
114	DOWCO INC.
115	DURATEK FEDERAL SERVICES, INC.
116	E.D. BULLARD COMPANY
117	EAGLE-PICHER CORPORATION
118	EDEN STONE CO. INC.
119	EDISON ELECTRIC INSTITUTE INC.
120	EET CORPORATION

	PLAN SPONSOR
121	ELI LILLY
122	ELKAY MANUFACTURING COMPANY
123	ELMER'S PRODUCTS INC.
124	EMPIRE LEVEL MANUFACTURING CORP.
125	ENERCON ENGINEERING, INC.
126	ENERGY EAST CORP.
127	ENERGY NORTHWEST
128	EP LOYA GROUP, L.P.
129	ERICSSON INC.
130	ETHAN ALLEN GLOBAL INC.
131	E-S PLASTIC PRODUCTS INC.
132	FATHER FLANAGAN'S BOYS' HOME
133	FERRELL COMPANIES, INC.
134	FERRO CORP.
135	FISHER & COMPANY, INCORPORATED
136	FITCH, INC.
137	FIVE STAR DISTRIBUTING, INC.
138	FONTANESI & KAHN
139	FOREMOST FARMS USA
140	FOREST LABORATORIES, INC.
141	FLORIDA CHAMBER OF COMMERCE
142	FLORIDA GAS TRANSMISSION COMPANY
143	FLO-TORK, INC.
144	FOX CITIES CHAMBER OF COMMERCE & INDUSTRY
145	FRANK W. KERR COMPANY
146	FREEPORT MCMORAN / PHELPS DODGE CORP.
147	GARDNER DENVER, INC.
148	GERLIN, INC. DBA CORE PIPE PRODUCTS, INC.
149	GENERAC
150	GENERAL MILLS
151	GEO CONSULTANTS, LLC
152	GHP OPERATING COMPANY LLC (GLOBAL HOME PRODUCTS)
153	GILLETTE / PROCTER & GAMBLE
154	GLENMARK INDUSTRIES INC.
155	GPD, INC.
156	GREAT PLAINS ENERGY INCORPORATED
157	GREATER BINGHAMTON CHAMBER OF COMMERCE
158	GREATER GREENVILLE CHAMBER OF COMMERCE
159	GREATER JACKSON CHAMBER PARTNERSHIP
160	GREATER LOUISVILLE INC.
161	GREATER NEW HAVEN CHAMBER OF COMMERCE
162	GREATER PROVIDENCE CHAMBER OF COMMERCE

	PLAN SPONSOR
163	GREATER RALEIGH CHAMBER OF COMMERCE
164	GREATER READING CHAMBER OF COMMERCE/INDUSTRY
165	GREATER SCRANTON CHAMBER OF COMMERCE
166	GREATER TAMPA CHAMBER OF COMMERCE
167	GREATER TOPEKA CHAMBER OF COMMERCE
168	GREATER WACO CHAMBER OF COMMERCE
169	GREATER WASHINGTON BOARD OF TRADE
170	GREEN DIAMOND RESOURCE COMPANY
171	GREEN THUMB LAWNSCAPING, INC.
172	GRINDMASTER CORPORATION
173	GROESBECK LUMBER & SPPLY, INC.
174	GZA GEOENVIRONMENTAL, INC.
175	H&S TOOLS INC.
176	HALEY & ALDRICH INC
177	HAPAQ-LLOYD
178	HAMPTON ROADS CHAMBER OF COMMERCE
179	HARRIS PUBLICATIONS, INC.
180	HARTFORD CHAMBER OF COMMERCE
181	HARVEY M. ROSE ASSOCIATES, LLC
182	HASBRO INC.
183	HAYES LEMMERZ / HLI OPERATING COMPANY, INC.
184	HEALTH INSURANCE PLAN OF GREATER NEW YORK
185	HEART CITY AUTOMOTIVE, INC.
186	HFI, LLC
187	HIGH-TECH INSTITUTE, INC.
188	HIP ADMINISTRATORS OF FLORIDA, INC.
189	HILTON HEAD ISLAND CHAMBER OF COMMERCE
190	HITACHI AMERICA LTD
191	HOME DEPOT, INC.
192	HORNBERGER, SHEEHAN, FULLER & BEITER, INC.
193	HORNER ELECTRIC INC.
194	HOSPIRA INC.
195	HOSPIRA PUERTO RICO LLC
196	HP HOOD LLC
197	HUDSON, POTTS & BERNSTEIN L.L.P.
198	HUGHES HUBBARD & REED LLP
199	HUHTAMAKI AMERICAS, INC.
200	IDEARC, INC.
201	INDIANA DIMENSION, INC.
202	INDUSTRIAL STEEL INC.
203	INFINITY SYSTEMS ENGINEERING, LLC
204	INFINITY TECHNOLOGY SERVICES, LLC

	PLAN SPONSOR
205	INTERACTIVE DATA
206	INTERMET CORP
207	INTERNATIONAL PAPER COMPANY
208	INTERPUBLIC GROUP OF COMPANIES (IPG)
209	IPSOS AMERICA, INC.
210	J. HORST MANUFACTURING CO. INC.
211	JEFFERSON CHEVROLET CO.
212	JETRO CASH & CARRY ENTERPRISES, LLC
213	JOHN BURNS CONSTRUCTION COMPANY
214	JOHNSON & QUIN, INC.
215	JOHNSTOWN AREA REGIONAL INDUSTRIES, INC.
216	JSJ CORPORATION
217	KALAMAZOO REGIONAL CHAMBER OF COMMERCE
218	KALIL BOTTLING CO.
219	KEARFOTT GUIDANCE & NAVIGATION CORPORATION
220	KEATING OF CHICAGO, INC.
221	KELLY SERVICES INC.
222	KEY TRONIC CORPORATION
223	KULICKE & SOFFA INDUSTRIES, INC.
224	KEY ENERGY SERVICES, INC.
225	KEYSPAN ENERGY CORPORATION / NATIONAL GRID USA
226	KOCH INDUSTRIES, INC.
227	L.W. BARRETT CO., INC.
228	LAMERS BUS LINES, INC.
229	LAN-CON, INC.
230	LEE ENTERPRISES INC.
231	LEMAN USA INC.
232	LIBBEY INC.
233	LIGGETT GROUP INC.
234	LINDE HOLDINGS, LLC
235	LINDE GROUP / BOC GROUP
236	LITTLE ROCK REGIONAL CHAMBER OF COMMERCE
237	LOCHMANDY MOTOR SALES, INC.
238	LOUISIANA ASSOCIATION OF BUSINESS & INDUSTRY
239	MAGNETEK, INC.
240	MARIAN, INC.
241	MCDONALD'S CORP.
242	MCKENZIE MEMORIAL HOSPITAL
243	MCWILLIAMS ELECTRIC COMPANY INC.
244	M-D BUILDING PRODUCTS, INC.
245	MDM SERVICES CORPORATION
246	MEADOWBROOK DODGE, INC

	PLAN SPONSOR
247	MEMPHIS AREA CHAMBER OF COMMERCE
248	MERCHANTS MUTUAL INSURANCE COMPANY
249	METAL-ERA, INC.
250	METROPOLITAN TULSA CHAMBER OF COMMERCE
251	MIAMI-LUKEN, INC.
252	MIAMI VALLEY RESEARCH FOUNDATION
253	MICHIGAN CORPORATE SERVICES, LLC
254	MICHIGAN MAPLE BLOCK COMPANY
255	MIKE RAISOR PONTIAC, INC.
256	MILLBROOK EMPLOYEE LEASING CORP.
257	MINDPEARL (US) INC.
258	MIRAMED GLOBAL SERVICES, INC.
259	MITSUBA BARDSTOWN, INC.
260	MITSUBISHI MOTORS NORTH AMERICA, INC.
261	MITTAL STEEL USA INC. / ARCELORMITTAL
262	MODERN DROP FORGE CO.
263	MOOG INC.
264	MOORE FUNERAL HOME INC.
265	MOVADO GROUP INC.
266	NATIONAL DISTRIBUTING COMPANY, INC.
267	NATIONAL HEALTH SYSTEMS INC.
268	NATIONAL TANK COMPANY
269	NAVISTAR
270	NCL (BAHAMAS) LTD. D/B/A NCL
271	NEFF ENGINEERING CO, INC.
272	NETWORK EQUIPMENT TECHNOLOGIES INC.
273	NEWARK REGIONAL BUSINESS PARTNERSHIP
274	NEW CENTURY FINANCIAL CORP.
275	NEWPORT SERVICE CORP
276	NFT INCORPORATED
277	NORTHERN KENTUCKY CHAMBER OF COMMERCE
278	NOVARTIS / CIBA-GEIGY CORP.
279	NIBLOCK EXCAVATING, INC.
280	NORTH COAST DISTRIBUTING, INC.
281	NORTH COUNTRY MOBILE HOMES, INC.
282	ODESSA CHAMBER OF COMMERCE
283	ODESSA CHAMBER OF COMMERCE PROFIT SHARING
284	ODIN, FELDMAN, & PITTLEMAN, P.C.
285	O'DONNELL WICKLUND PIGOZZI AND PETERSON INC.
286	OKLAHOMA STATE CHAMBER OF COMMERCE
287	OLD DOMINION
288	OLMARC PACKAGING COMPANY

	PLAN SPONSOR
289	OLYMPUS CORPORATION OF THE AMERICAS
290	ORCHARD FIRST SOURCE CAPITAL, INC.
291	OREGON ANESTHESIOLOGY GROUP, P.C.
292	PACIFIC WESTERN TECHNOLOGIES, LTD.
293	PACKAGING CORPORATION OF AMERICA (PCA) (HOURLY)
294	PACKAGING CORPORATION OF AMERICA (PCA) (SALARIED)
295	PARAGON COMPUTER PROFESSIONALS, INC.
296	P-COR, LLC
297	PDC FACILITIES, INC.
298	PEARSON, INC.
299	PENSION PLAN OF THE GOVERNMENT EMPLOYEES HOSPITAL ASSOCIATION INC.
300	PENTON LEARNING SYSTEMS, L.L.C.
301	PEROT SYSTEM CORP.
302	PETERSEN ALUMINUM CORPORATION
303	PIPEFITTERS LOCAL NO. 636
304	POLSINELLI SHALTON WELTE SUELTHAUS P.C.
305	PRECISION CONTROL SYSTEMS OF INDIANAPOLIS, INC.
306	PRINT AND CONVERTING RESOURCES, LLC
307	PROCTER & GAMBLE CO.
308	PROCTER & GAMBLE SUBSIDIARIES
309	PROFESSIONAL PROJECT SERVICES, INC.
310	PROFESSIONAL X-RAY CENTER PC
311	R.A.P.E.L. INC.
312	RAIA PROPERTIES CORPORATION
313	REED & BARTON CORPORATION
314	RELIANCE GEAR CORPORATION
315	REPUBLIC NATIONAL DISTRIBUTING COMPANY
316	RESCAR COMPANIES
317	REYNOLDS & REYNOLDS
318	RICHMOND METROPOLITAN CONVENTION & VISITORS
319	ROBERT BOSCH
320	ROCK & BORGELT P.C.
321	ROGERS BROTHERS, INC.
322	ROHR-TIPPE MOTORS, INC.
323	ROPES & GRAY LLP
324	ROSE PRINTING SERVICES, INC.
325	ROTHBERG, LOGAN AND WARSCO LLP
326	ROWLAND DESIGN, INC.
327	ROY O. MARTIN LUMBER COMPANY, LLC
328	RUSSELL STOVERS CANDIES, INC.
329	RYDER SCOTT CO. L.P.

	PLAN SPONSOR
330	S.E.L., INC.
331	SAFETY AND ECOLOGY CORPORATION
332	SAFETY VISION, L.P.
333	SALINA AREA CHAMBER OF COMMERCE
334	SALT RIVER PROJECT AGRICULTURAL IMPROVEMENT AND POWER DISTRICT
335	SANTA CLARA CHAMBER OF COMMERCE
336	SCHIFF NUTRITION GROUP, INC.
337	SCHWARZ PAPER COMPANY
338	SCHWAN SHARED SERVICES, LLC
339	SCOTTSDALE CONVENTION & VISITORS BUREAU
340	SHAW ENVIRONMENTAL, INC.
341	SHREVEPORT CHAMBER OF COMMERCE
342	SEARLES VALLEY MINERALS
343	SELECT INTERNATIONAL CORP.
344	SEMITOOL, INC.
345	SHAKLEE CORPORATION
346	SIEMANS PERSONNEL, LLC
347	SIMPSON INVESTMENT COMPANY
348	SKAFF CARPET AND FURNITURE CO.
349	SOUTHERN UNION COMPANY
350	SPERION CORPORATION
351	SPOKANE REGIONAL CHAMBER OF COMMERCE
352	SPRINGFIELD AREA CHAMBER OF COMMERCE
353	SPRINGFIELD CONVENTION & VISITORS BUREAU, INC
354	SPRINGS INDUSTRIES INC.
355	SPRINGS WINDOW FASHIONS, LLC
356	SR. CARE CENTERS MANAGEMENT, LLC
357	SSW HOLDING COMPANY, INC.
358	ST. LANDRY PARISH SOLID WASTE DISPOSAL DISTRICT
359	ST. LOUIS REGIONAL CHAMBER & GROWTH ASSOC
360	ST. JUDE MEDICAL, INC.
361	STANDARD MOTOR PRODUCTS, INC.
362	STANDARD PACIFIC CORP
363	STARK DEVELOPMENT BOARD
364	STAR MARKETS, LTD.
365	STATE BANK OF LIZTON
366	STEEL TECHNOLOGIES, INC.
367	STERLING HEIGHTS DODGE INC.
368	SUMMIT MEDICAL GROUP
369	SUPREME MACHINED PRODUCTS CO. INC.
370	SUSQUEHANNA PFALTZGRAFF CO.

	PLAN SPONSOR
371	SWISS INTERNATIONAL AIRLINES, LTD.
372	SWISS RE AMERICA HOLDING CORP.
373	SYNERGIS TECHNOLOGIES GROUP
374	SYPRIS SOLUTIONS, INC.
375	TACOMA-PIERCE COUNTY CHAMBER OF COMMERCE
376	TAYLOR CORP. INC.
377	TAYLOR, PORTER, BROOKS, & PHILLIPS LLP
378	TERREBONNE MOTOR COMPANY, INC.
379	TETRA TECH, INC.
380	TEXAS ENERGY ENGINEERS, INC.
381	TFE, INC.
382	TGW-ERMANCO INC.
383	THE BUSINESS COUNCIL OF FAIRFIELD COUNTY
384	THE CHAMBER, DAYTONA BEACH & HALIFAX AREA
385	THE FITZPATRICK COMPANY
386	THE L.D. KICHLER CO.
387	THE LOXCREEN COMPANY, INC.
388	THE MAYER ELECTRIC SUPPLY CO., INC
389	THE MERCO GROUP, INC.
390	THE NPD GROUP, INC.
391	THERMATOOL CORPORATION
392	TIMKEN CO. (SALARY)
393	TIMKEN CO. (UNION)
394	TITAN INTERNATIONAL INC.
395	TOSHIBA TUNGALOY AMERICA, INC.
396	TRACHTE INC.
397	THETA TECHNOLOGIES, INC.
398	THE TRANZONIC COMPANIES
399	TREDEGAR CORPORATION
400	TREE TOP, INC.
401	TRIVEST SERVICE CORPORATION
402	TRUSSAL AND COMPANY
403	TS TECH HOLDING CO.
404	UNITED BUSINESS MEDIA
405	UNITED MINE WORKERS OF AMERICA (UMWA)
406	UNITED STATES BRASS & COPPER
407	URS GROUP, INC.
408	USG CORP.
409	UTILITIES INC.
410	VALASSIS
411	VENTURE ENCODING SERVICE, LLC
412	VERITAS

	PLAN SPONSOR
413	VIASAT, INC.
414	VIJUK EQUIPMENT, INC.
415	VULCAN IRON WORKS
416	WALNUT CREEK CHAMBER OF COMMERCE
417	WASTREN, INC.
418	WESKEM, LLC
419	WHITE HOUSE MANUFACTURING CORP.
420	WILLIAMSBURG AREA CHAMBER OF COMMERCE
421	WILLIAMS FORM ENGINEERING CORPORATION
422	WILSON ELECTRIC COMPANY
423	WILSONS THE LEATHER EXPERTS
424	WINNEBAGO COLOR PRESS, INC.
425	WINNEBAGO INDUSTRIES, INC.
426	WINSTON HEAT TREATING, INC.
427	WORLD BANK
428	WSMS MID-AMERICA, LLC
429	WSMS-MK, LLC
430	YOKEM MOTORS, INC.
431	YORK COUNTY CHAMBER OF COMMERCE
432	YORK COUNTY ECONOMIC DEVELOPMENT

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Notice of Class Action Settlement and Fairness Hearing

You have been identified as a participant or beneficiary in your employer's 401(k) retirement savings plan through which you were invested at relevant times in certain JPMorgan stable value funds. You could get a payment from this Class Action Settlement.

The Court has authorized this notice. This is not a solicitation from a lawyer. Neither you nor your retirement plan is being sued.

I. PLEASE READ THIS SETTLEMENT NOTICE CAREFULLY

The purpose of this Notice is to inform you the Court has given its preliminary approval to a proposed settlement (the "Settlement") of a class action brought by certain individuals whose 401(k) plan accounts included investments in the JPMorgan stable value funds. The action is entitled *In re: J.P. Morgan Stable Value Fund ERISA Litigation*, case no. 12-CV-2548 (the "Action"), currently pending before the Honorable Vernon S. Broderick of the United States District Court for the Southern District of New York (the "Court"). The Court has given its preliminary approval to the Settlement. You should read this notice carefully, because your legal rights are affected whether you act or do not act.

The Plaintiffs brought the Action alleging violations of the Employment Retirement Income Security Act ("ERISA"), concerning the way Defendants JPMorgan Chase & Co. and other JPMorgan entities ("Defendants" or "JPMorgan") managed the Class Members' 401(k) plan investments that were allocated to certain JPMorgan stable value funds.

JPMorgan denies all claims, and nothing in the Settlement is an admission or concession on JPMorgan's part of any fault or liability whatsoever.

In its March 31, 2017, Memorandum Opinion and Order, the Court certified a class and three subclasses of individuals who were participants or beneficiaries in their employer's 401(k) plans and had some of their investments allocated to a stable value fund managed by JPMorgan during the class periods. (The definition of the class and the class periods is set forth below in Section II, "Definition of the Class.") The names of the 401(k) plans through which Class Members allocated retirement assets to JPMorgan stable value funds are listed in Attachment 1 to this Notice.¹

A. The Settlement

As part of the Settlement, a fund of \$75,000,000 (the "Settlement Amount") has been established to resolve the Action. From that \$75,000,000 will first be paid any administrative expenses, taxes, tax expenses, Court-approved attorneys' fees and costs, Class Representative service awards, and other approved expenses of the litigation. Then, the remaining Settlement Amount (called the "Net Settlement Amount") will be allocated to Class Members according to the Plan of Allocation to be approved by the Court. Shortly after the Court preliminarily approved the Settlement, JPMorgan deposited the \$75,000,000 Settlement Amount in an interest-bearing Qualified Settlement Fund. Upon final approval of the Settlement by the Court, the interest accrued on the Settlement Fund will be added to the Settlement Amount in order to benefit the Class.

The Settlement provides, among other things, for the allocation of monies directly into the individual accounts of Class Members who had an account with a positive balance (an "Active Account") in one of the 401(k) plans that are listed in Attachment 1 as of the most current participant data received by Class Counsel ("Current Participants").

¹ Attachment 1 lists the plans which, according to information available at the time of the Settlement, offered a JPMorgan stable value fund during the class period. The plans identified on Attachment 1 may change based on the subsequent investigation of the parties.

Class members who are entitled to a distribution but who no longer have an “Active Account” in one of the Plans listed in Attachment 1 (“Former Participants”) will receive their allocation by check mailed to their last known address or by rollover if available and elected.

Our records indicate that you are a Former Participant. You must return a Claim Form by _____ to participate in the Settlement. (See answer to Question No. 6 below for more information.)

B. Statement of Attorneys’ Fees and Costs in the Class Action

Co-Lead Class Counsel, and the firms assisting them, have devoted many hours to bringing this case and pursuing it for the past five-and-a-half years. During that time, they also have advanced costs for expert consulting services, substantial investigation, intensive document analysis, and other costs necessary to pursue the case. Co-Lead Class Counsel’s motion for class certification was granted by the Court on March 31, 2017. Co-Lead Class Counsel successfully defended JPMorgan’s petition for an immediate appeal of the Class Certification Order, which the Second Circuit denied. Co-Lead Class Counsel engaged in substantial investigation and analysis of the law and facts concerning the Action in opposing JPMorgan’s motion for summary judgment. This work resulted in the monetary benefits provided in the Settlement. Co-Lead Class Counsel took the risk of litigation and have not been paid for any of their time or reimbursed for any of the costs that they have incurred during the more than five years that the Action has been pending before the Court. Co-Lead Class Counsel also have agreed to undertake the additional risk of paying some of the administrative costs of the settlement process if the Settlement is not approved.

Co-Lead Class Counsel will apply to the Court for payment of attorneys’ fees and costs for their work in the case. Co-Lead Class Counsel will request fees not to exceed one-third of the \$75,000,000 Settlement Amount and will request reimbursement of litigation costs not to exceed

\$1,750,000. Any attorneys' fees and costs awarded by the Court to Co-Lead Class Counsel will be paid from the Qualified Settlement Fund. Co-Lead Class Counsel will not seek to receive any interest earned by the Qualified Settlement Fund, which will be added to the Net Settlement Amount.

As is customary in class action cases in which the Class Representatives have spent time and effort on the litigation, Co-Lead Class Counsel also will ask the Court to approve Service Award payments, not to exceed \$20,000, for each of the 12 Class Representatives who took on the risk of litigation, provided discovery, and committed to spend the time necessary to bring the case to conclusion. Their activities also included assisting in the factual development of the Action.

II. DEFINITION OF THE CLASS

You are deemed to be part of the Class and a participant in this Action if you fit into one or more of the class or subclass definitions below, unless you expressly exclude yourself from the Class in writing. (See answer to Question No. 8 below.)

By order dated March 31, 2017, the Court certified this case to proceed on behalf of a class defined as follows:

All participants of ERISA plans, as well as beneficiaries of those plans, who were invested directly or indirectly in any JPM Stable Value Fund that invested in the JPM Intermediate Bond Fund and/or the Intermediate Public Bond Fund between January 1, 2009 and December 31, 2010 and whose stable value fund investment performance underperformed the Hueler index or similar objective benchmark. Excluded from the Class are the jurists to whom this case is assigned, as well as their respective staffs; counsel who appear in this case, as well as their respective staffs, including experts they employ; the Defendants in this matter, as well as their officers and directors; any person, firm, trust, corporation, officer, director, or other individual or entity in which a Defendant has a controlling interest or that is related to or affiliated with any of the Defendants; and the legal representatives, agents, affiliates, heirs, successors-in-interest, or assigns of any such excluded party.

In addition, the Court certified three subclasses. The first certified subclass—the "SAIF Subclass"—is defined as follows:

All participants of ERISA plans, as well as beneficiaries of those plans, who were invested directly or indirectly in the JPM Stable Asset Income Fund (“SAIF”) from between January 1, 2009 and December 31, 2010 and whose stable value fund investment underperformed the Hueler Index or similar objective benchmark. Excluded from the Class are the jurists to whom this case is assigned, as well as their respective staffs; counsel who appear in this case, as well as their respective staffs, including experts they employ; the Defendants in this matter, as well as their officers and directors; any person, firm, trust, corporation, officer, director, or other individual or entity in which a Defendant has a controlling interest or that is related to or affiliated with any of the Defendants; and the legal representatives, agents, affiliates, heirs, successors-in-interest, or assigns of any such excluded party.

The second certified subclass—the “ACSAF/JP Morgan Stable Value Fund Subclass”—has a class period that begins on September 17, 2007. The ACSAF/JP Morgan Stable Value Fund Subclass is defined as follows:

All participants of ERISA plans, as well as beneficiaries of those plans, who were invested directly or indirectly in the American Century Stable Asset Fund [(“ACSAF”)] immediately before JPMAM took over the Fund and received its assets in the ACSAF/JPM Stable Value Fund on or about September 17, 2007 and continuing to December 31, 2010, and whose stable value fund investment underperformed the Hueler Index or similar objective benchmark. Excluded from the class are the jurists to whom this case is assigned, as well as their respective staffs; counsel who appear in this case, as well as their respective staffs, including experts they employ; the Defendants in this matter, as well as their officers and directors; any person, firm, trust, corporation, officer, director, or other individual or entity in which a Defendant has a controlling interest or that is related to or affiliated with any of the Defendants; and the legal representatives, agents, affiliates, heirs, successors-in-interest, or assigns of any such excluded party.

The third certified subclass—the “Caterpillar Subclass”—is defined as follows:

All participants of the Caterpillar Plan, as well as beneficiaries of those plans, who were invested directly or indirectly in JPM’s Caterpillar Stable Principal Fund or any other JPM Stable Value Fund that invested in the Intermediate Bond Fund and / or the Intermediate Public Bond Fund between January 1, 2009 and December 31, 2010 and whose stable value fund investment performance underperformed the Hueler index or similar objective benchmark. Excluded from the class are the jurists to whom this case is assigned, as well as their respective staffs; counsel who appear in this case, as well as their respective staffs, including experts they employ; the Defendants in this matter, as well as their officers and directors; any person, firm, trust, corporation, officer, director, or other individual or entity in which a Defendant has a controlling interest or that is related to or affiliated with any of the

Defendants; and the legal representatives, agents, affiliates, heirs, successors-in-interest, or assigns of any such excluded party.

The “objective benchmark” referenced in each of these definitions will be the Lehman Brothers Intermediate Aggregate Index (later renamed the Barclays Intermediate Aggregate Index) (hereafter the “Lehman/Barclays Intermediate Aggregate Index” or the “Benchmark”).

1. Why Did I Receive This Settlement Notice?

You received this Notice because records from the record keeper for your 401(k) plan show that you were a participant or beneficiary in a 401(k) plan and that your 401(k) plan account included investments in a JPMorgan stable value fund, and you otherwise may be part of the Class or one of the Subclasses, as explained above.

2. What Is The Class Action About?

In this Class Action, Plaintiffs principally allege that Defendants violated ERISA in two fundamental ways. First, Plaintiffs allege that JPMorgan managed Plaintiffs’ investments imprudently in violation of JPMorgan’s fiduciary duties, by causing its stable value funds to invest in two other JPMorgan funds, the Intermediate Bond Fund (“IBF”) and the Intermediate Public Bond Fund (“IPBF”), which, in turn, invested in risky, highly leveraged assets, including, among other things, mortgage-related assets. Second, Plaintiffs allege that certain Defendants, as fiduciaries for the relevant plans and their participants and beneficiaries, breached their obligations under ERISA to comply with the duties of prudence and diversification and to discharge their duties solely in the interests of plan participants and beneficiaries, and for the exclusive purpose of providing benefits to the plan participants and beneficiaries. Plaintiffs also claim that certain Defendants engaged in transactions prohibited by ERISA, and the ACSAF/JPM Stable Value Fund Subclass Plaintiffs make additional claims against all Defendants for engaging in transactions prohibited by ERISA.

While none of the Plaintiffs or Class Members lost any of the money they invested in JPMorgan stable value funds, the Plaintiffs alleged that they were damaged because the investment return paid to Class Members would have been greater if the funds had been prudently managed.

Defendants have denied and continue to deny the claims and contentions of the Class Representatives. Defendants deny that they are liable at all to the Class, and that the Class has suffered any harm or damage for which Defendants could or should be held responsible. Nothing in the Settlement Agreement is an admission or concession on Defendants’ part of any fault or liability whatsoever.

3. Why Is There A Settlement?

The Court has not reached a final decision on the merits of the Class Representatives’ claims. Instead, a majority of the Class Representatives (the “Settling Class Representatives”) and Defendants have agreed to the Settlement. The Settlement is the product of extensive negotiations

between Co-Lead Class Counsel and Defendants' counsel and an in-person mediation session with a private mediator, followed by months of further negotiation. The parties to the Settlement have taken into account the uncertainty and risks of litigation and have concluded that it is desirable to settle on the terms and conditions set forth in the Settlement Agreement.

[Objectors' Proposal - Four of the twelve Class Representatives do not approve of the settlement. Those four Class Representatives are represented by Philip Greenfield and Kirk May, German May PC, 1201 Walnut Street, 20th Floor, Kansas City, MO, 816-471-7700, www.germanmay.com.]

4. What Does The Settlement Provide?

The Net Settlement Amount will be allocated to Class Members according to a Plan of Allocation to be approved by the Court. Class Members fall into two categories: Current Participants and Former Participants, as defined on pages 2-3 above. Allocations to Current Participants who are entitled to a distribution under the Plan of Allocation will be made into their existing plan accounts in accord with their current investment elections. Allocations to Former Participants who are entitled to a distribution under the Plan of Allocation will be made by check mailed to their last known address or, if available and they so elect, as a rollover to a qualified retirement account.

In return for payment to the Class of the \$75,000,000 Settlement Amount, all Class Members will fully release the Defendants and the Released Parties from the Released Claims. The Released Parties include Defendants, any related entities, as well as any past attorneys and agents. The Released Claims include (but are not limited to) the following:

- All claims that were or could have been asserted in the Action, or that did or could arise out of the conduct alleged in the complaints filed in the Action.
- All claims that relate to any JPMorgan stable value fund investments, the holdings of any stable value fund investments, or disclosures regarding any stable value investments.
- All claims that relate to the direction to calculate, the calculation of, and/or the method or manner of allocation of the Net Settlement Fund pursuant to the Plan of Allocation.

This is only a summary of the Released Parties and Released Claims and is not a binding description of either. The governing releases are found within the Settlement Agreement at www.jpmsvfcassaction.com. Generally, the release means that Class Members will not have the right to sue the Defendants or related parties for conduct during the Class Period arising out of or relating to the allegations in the Action.

The entire Settlement Agreement is available at www.jpmsvfcassaction.com.

5. How Much Will My Distribution Be?

The amount, if any, that will be allocated to you will be based upon records maintained by your employer's 401(k) plan's record keeper and your Former Participant Claim Form. Calculations regarding the individual distributions will be performed by the Settlement Administrator, whose determinations will be final and binding, pursuant to the Court-approved Plan of Allocation.

To be eligible for a distribution from the Net Settlement Amount, you must either be: (1) a member of the Class or one of the Subclasses, as defined in Section II above, who submitted a complete and satisfactory Claim Form by the deadline; or (2) a beneficiary, alternate payee, or attorney-in-fact of persons identified in (1) or (2).

Under the proposed Plan of Allocation, the Net Settlement Amount will be divided among all Class Members based upon the underperformance, if any, of each Class Member's JPMorgan stable value investment compared to the Lehman/Barclays Intermediate Aggregate Index. At the Fairness Hearing, the Court will be asked to approve this calculation process as part of the Plan of Allocation.

To make this allocation, the Settlement Administrator will first calculate the Individual Underperformance Amounts by comparing the underperformance, if any, of the JPM Stable Value Funds by comparing the crediting rate of the Plans the participants invested in, with a crediting rate derived from the Benchmark. If the calculation shows that a Plan did not experience any underperformance compared to the Benchmark then the participants in those Plans are not by definition Class Members because they did not suffer from any underperformance damages. For those Plans that experienced underperformance the second step will be for the Settlement Administrator to calculate the Individual Underperformance Amounts as the total dollar value amount by which each participant's individual investment in JPM Stable Value Funds underperformed the Benchmark during the relevant time periods. The specific method for calculating these amounts is detailed in the Settlement Agreement's Plan of Allocation. The sum of all Individual Underperformance Amounts is defined to be the "Total Underperformance Amount."

Once the Underperformance Amounts have been calculated, each Class Member's payment will be calculated by multiplying the Net Settlement Amount by the ratio of that Class Member's Individual Underperformance Amount to the Total Underperformance Amount. This will allow each individual Class Member to receive an allocation from the Net Settlement Amount proportional to the underperformance of his or her stable value investment compared with the underperformance of other Class Members' investments (all other things being equal). Plan of Allocation examples are available on the website, www.jpmsvfcassaction.com.

Class Counsel and the Settlement Administrator must review information from your 401(k) plan account to determine whether your investments in JPMorgan stable value funds underperformed as compared to the Benchmark. Any information Class Counsel obtains will be treated confidentially under the Protective Order entered by the Court in this Action and will be used solely for purposes of determining if you are a Class Member entitled to payment under the terms of the Settlement.

6. How Can I Receive My Distribution?

Whether you need to submit a claim form to receive your distribution depends on whether you are a “Current Participant” or a “Former Participant.” **According to your Plan’s record keeper, you are a Former Participant. In order to receive your distribution, you must return a valid and timely Claim Form received by the Settlement Administrator no later than Month 00, 0000. A Claim Form is enclosed with this Notice.**

7. When Will I Receive My Distribution?

The timing of the distribution of the Net Settlement Amount is conditioned on several events, including the Court’s final approval of the Settlement and that approval being no longer subject to any appeal in any court. If there is an appeal of the final approval, it may take several years to resolve and the distribution of the Net Settlement Amount will be delayed until that process is complete. If the Settlement is approved by the Court, and there are no appeals, distribution of the Net Settlement Amount likely will occur in 2019.

Separately, there are provisions in the Settlement Agreement that allow the parties to terminate the Settlement under specific conditions. There will be no payments under the Settlement if the Settlement Agreement is terminated.

There will be no payment to you if the Settlement Administrator determines that your individual JPMorgan stable value investment did not suffer any Underperformance Amount when measured against the Benchmark.

If the amount you are allocated is less than the amount of the reasonable direct costs of processing and delivering your payment then no distribution will be made to you. For example, if your allocation is less than \$5 and the reasonable direct costs of processing the payment and delivery are greater than \$5, you would not be eligible to receive any payment under the Settlement.

8. Can I Get Out Of The Settlement?

Yes, you have the right to exclude yourself from the Class and give up the right to your share of the Settlement Amount. Note: if you exclude yourself from the Class, you may not have a right to bring your own lawsuit due to ERISA’s six-year statute of repose. Class Counsel is of the opinion that ERISA’s six-year statute of repose bars you from bringing your own lawsuit. You may consult your own lawyer to get advice on this issue at your own expense.

If you ask to be excluded, you won’t have a right to receive a payment from the Settlement. You will also not be bound by any judgment of the Court or the terms of the Settlement Agreement, including the release of your potential claims. However, under the United States Supreme Court’s ruling in *California Public Employees’ Retirement System v. ANZ Securities Inc.*, No. 16-373, 582 U.S. __ (2017), your rights to prosecute any individual claims against the Defendants arising out of these transactions may have already expired due to ERISA’s six-year statute of repose.

To ask to be excluded from this proceeding, you must send an “Exclusion Request” by letter, expressly stating that you want to be excluded from the Class in *In re: J.P. Morgan Stable Value Fund ERISA Litigation*. Be sure to include your name and address, and sign the letter. You must mail your Exclusion Request, postmarked by Month 00, 0000, to the Settlement Administrator at the following address:

JPM Stable Value Fund Litigation
c/o JND Class Action Administration
P.O. Box 91304
Seattle, WA 98111

9. Do I Have A Lawyer In The Case?

The Court has appointed The Law Offices of Michael M. Mulder and Schneider Wallace Cottrell Konecky Wotkyns LLP to represent the Class as Co-Lead Class Counsel. Co-Lead Class Counsel are working jointly with and being assisted by the law firms of Levin Papantonio Thomas Mitchell Rafferty & Proctor, P.A; and Peiffer Rosca Wolf Abdullah Carr & Kane, APLC. If you want to be represented by your own lawyer, you may hire one at your own expense.

10. How Will The Lawyers Be Paid?

Co-Lead Class Counsel will file a petition for the award of attorneys’ fees and costs. This petition will be considered at the Fairness Hearing. Co-Lead Class Counsel has agreed to limit their application for an award of attorneys’ fees and costs to not more than \$25,000,000 in fees and \$1,750,000 in costs. The Court will determine what fees and costs will be approved.

11. How Do I Tell The Court If I Don’t Like The Settlement?

If you are a Class Member, you can tell the Court that you do not agree with the Settlement or some part of it. To object, you must send the Court a written statement that you object to the Settlement in *In re: J.P. Morgan Stable Value Fund ERISA Litigation*, Case No. 12-cv-02548. Be sure to include your name, address, telephone number, signature, and a full explanation of why you object to the Settlement. Your written objection must be mailed to each of the following addressees and received by the Court no later than XXXXXXX, 2019.

THE COURT	CLASS COUNSEL	<u>[Objectors' Proposal - COUNSEL FOR FOUR CLASS REPRESENTATIVES]</u>
Clerk of the Court United States District Court Southern District of New York, Daniel Patrick Moynihan United States Court House 500 Pearl Street, New York, New York 10007	Schneider Wallace Cottrell Konecky Wotkyns LLP Attn: JPM Stable Value Fund ERISA Litigation 2000 Powell Street, Suite 1400 Emeryville, California 94608 counsel@jpmsvfclassaction.com Tel: 1-844-877-5925	<u>German May PC</u> <u>1201 Walnut Street</u> <u>20th Floor</u> <u>Kansas City, MO 64106</u> <u>Attn: JPM Stable Value Fund</u> <u>ERISA Litigation]</u>

12. When And Where Will The Court Decide Whether To Approve The Settlement?

The Court will hold a Fairness Hearing at the U.S. District Court, 500 Pearl Street, New York, NY 10007. The Court has not yet scheduled the specific day and time of that hearing, but under the terms of the Settlement Agreement, it will occur after _____, 20___. When the Fairness Hearing is scheduled by the Court, information regarding the hearing will be posted on the website for the Settlement at www.jpmsvfclassaction.com.

At the Fairness Hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are objections by Class Members, the Court will consider them. After the Fairness Hearing, the Court will decide whether to give its final approval to the Settlement. The Court also will consider the petition for Class Counsel's attorneys' fees and costs and any service awards to Class Representatives.

13. Do I Have To Attend The Fairness Hearing?

No, but you are welcome to come at your own expense. If you send an objection, you do not have to come to the Court to talk about it. As long as you have timely objected, the Court will consider it when the Court considers whether to approve the Settlement as fair, reasonable and adequate. You also may pay your own lawyer to attend the Fairness Hearing, but such attendance is not necessary.

14. May I Speak At The Fairness Hearing?

If you are a Class Member, you may ask the Court for permission to speak at the Fairness Hearing. To do so, you must send a letter or other paper called a "Notice of Intention to Appear at Fairness Hearing in *In re: J.P. Morgan Stable Value Fund ERISA Litigation*, Case No. 12-cv-02548." Be sure to include your name, address, telephone number, and your signature. Your Notice of Intention to Appear must be mailed to Class Counsel [Objectors' Proposal -and Counsel For Four Class Representatives] and filed with the Clerk of the Court no later than **XXXXX, 2019**. (Your notice must be mailed to each of the addressees listed in the answer to Question No. 11).

Please note that only Class Members may speak at the Fairness Hearing. If you have chosen to exclude yourself from the Settlement, you are no longer a member of the Settlement Class and may not speak at the Fairness Hearing.

15. What Happens If I Do Nothing At All?

If you are a Class Member, and you do nothing, you will be bound by the Settlement as described above in this Settlement Notice if the Settlement is finally approved, **BUT YOU WILL NOT RECIEVE ANY MONEY. THE ONLY WAY TO RECEIVE ANY MONEY IS TO FILE A CLAIM FORM NO LATER THAN XXXX, 2019.** (See Question No. 6.)

16. How Do I Get More Information?

This Settlement Notice does not fully describe all of the claims, defenses, or contentions of the parties. If you have questions about this Notice or the Action, please do not contact the Court. If you have questions regarding the Settlement, you can call Class Counsel at 1-844-877-5925, email Class Counsel at counsel@jpmsvfcclassaction.com, [\[Objectors' Proposal - call Counsel For Four Class Representatives at 816-471-7700, email Counsel For Four Class Representatives at philg@germanmay.com or kirkm@germanmay.com.\]](#) call the Settlement Administrator at 1-844-877-5911, write to the Settlement Administrator at JPM Stable Value Fund Litigation c/o JND Class Action Administration, P.O. Box 91304, Seattle, WA 98111, or go to the following website: www.jpmsvfcclassaction.com where you will find the Court's order certifying the Class, the Plaintiffs' Consolidated and Amended Complaint, the Defendants' Answer to the Consolidated and Amended Complaint, the Settlement Agreement, and information regarding the day, time, and location of the Fairness Hearing once it has been scheduled by the Court. Other filings with the Court and information regarding the Settlement are also available online [\[Objectors' Proposal - or from the counsel noted above.\]](#).

Dated: _____, 2018

BY THE ORDER OF THE UNITED STATES
DISTRICT COURT FOR THE SOUTHERN
DISTRICT OF NEW YORK

ATTACHMENT 1

	PLAN SPONSOR
1	1888 MILLS, LLC
2	A.A. ANDERSON CO., INC.
3	ABILENE CHAMBER OF COMMERCE
4	ABITIBI CONSOLIDATED SALES CORPORATION
5	ACCE BENEFIT TRUST
6	ACCE BENEFITS TRUST
7	ACCE BENEFITS TRUST 401(K) PLAN
8	ADVANCED MEDICAL OPTICS, INC.
9	AGGREKO, LLC
10	AJAX PAVING INDUSTRIES OF FLORIDA, INC.
11	AJAX PAVING INDUSTRIES, INC.
12	ALASKA TANKER COMPANY ATC
13	ALCON LABS
14	ALLERGAN INC
15	ALM MEDIA INC.
16	ANCHOR ACQUISITION, LLC
17	AMARILLO CHAMBER OF COMMERCE
18	AMERICAN CHAMBER OF COMMERCE EXECUTIVES
19	AMERICAN CIVIL CONSTRUCTORS, INC.
20	AMERICAN LIGHTING ASSOCIATION
21	AMERICAN ROYAL ASSOCIATION
22	AMERICAN TECHNOLOGIES, INC.
23	ALLIANT ENERGY CORPORATE SERVICES, INC.
24	AMERICAN ELECTRIC POWER SERVICE CORP. (AEP)
25	ANDERSEN CORP.
26	ANDREW CORP.
27	ANGELO'S AGGREGATE MATERIALS, LTD.
28	ANNA TRUCKING L.L.C.
29	APAC PAPER & PACKAGING CORP.
30	ARBOR MANAGEMENT, INC.
31	ARCH CHEMICAL INC.
32	AREA ENERGY & ELECTRIC, INC.
33	ARGO GROUP US
34	ARIZONA CHEMICAL COMPANY

	PLAN SPONSOR
35	ARLINGTON METALS CORPORATION
36	ASPHALT PAVING, INC.
37	ASSOCIATED WHOLESALE GROCERS, INC.
38	ASTEC INDUSTRIES, INC.
39	ASTELLAS US LLC
40	ATLANTIC SOUTHEAST AIRLINES, INC
41	AUDIO AUTHORITY CORPORATION
42	AUGUSTA NEWSPRINT COMPANY
43	AVON PRODUCTS, INC.
44	B.F. GOODRICH / GOODRICH / UNITED TECHNOLOGIES CORPORATION (UTC)
45	BADGERLAND SUPPLY. INC.
46	BAESMAN PRINTING CORPORATION
47	BANK OF COMMERCE & TRUST COMPANY
48	BATON ROUGE AREA CHAMBER PROFIT SHARING PLAN
49	BECHTEL JACOBS COMPANY LLC
50	BECK TOYOTA CORP.
51	BEECHMONT PRESS, LLC
52	BELK INC.
53	BELL CORP.
54	BEMIS COMPANY, INC.
55	BENESYS, INC.
56	BERNARD, CASSISA, ELLIOTT AND DAVIS APLC
57	BEST BUY
58	BIGSTON CORPORATION
59	BIOMEDICAL RESEARCH FOUNDATION
60	BISON GEAR ENG. CORP
61	BOC EDWARDS, INC.
62	BOISE CONVENTION & VISITORS BUREAU PROFIT
63	BOISE METRO CHAMBER OF COMMERCE
64	BOSE CORP.
65	BRIGGS AND MORGAN P.A.
66	BRIGGS & STRATTON CORPORATION
67	BROCK MCVEY COMPANY
68	BROOK FURNITURE RENTAL INC.
69	BROOKSHIRE HOLDINGS, INC.
70	BROWN AND CALDWELL

	PLAN SPONSOR
71	BUCKEYE PIPE LINE SERVICES COMPANY
72	BUNN-O-MATIC CORPORATION
73	C.J. ENTERPRISES
74	CANBERRA OAK RIDGE, LLC
75	CARATRON INDUSTRIES, INC.
76	CARGILL INC.
77	CARL ZEISS VISION INC.
78	CARR INDUSTRIES, INC.
79	CARTER MACHINERY CO.
80	CATERPILLAR INC.
81	CDM FEDERAL SERVICES, INC.
82	CELANESE (HOECHST CELANESE)
83	CENTRALIZED LABORATORY SERVICES INC
84	CERNER CORP.
85	CHATTANOOGA AREA CHAMBER OF COMMERCE
86	CHRISTIAN REFORMED CHURCH IN NORTH AMERICA
87	CINCINNATI TOOL STEEL COMPANY
88	CJ HUGHES CONSTRUCTION COMPANY
89	CLARIAN HEALTH / INDIANA UNIV. HEALTH INC.
90	CLASEN QUALITY COATINGS, INC.
91	CLEAR LAKE AREA CHAMBER OF COMMERCE
92	COLE HARDWOOD INC.
93	COLLINS & AIKMAN PRODUCTS CO.
94	COLONIAL PIPELINE CO.
95	COMMODORE ADVANCE SCIENCES, INC.
96	COMSYS IT PARTNERS INC.
97	CONNING & COMPANY
98	COOK COMPOSITES & POLYMERS COMPANY
99	COOPERATIVE REGIONS OF ORGANIC PRODUCER POOLS COOPERATIVE, INC.
100	CROWN EQUIPMENT CORP.
101	CSK AUTO, INC.
102	CUMMINS INC.
103	CUSHMAN & WAKEFIELD, INC.
104	DACO INCORPORATED
105	DAKOTA CLINIC / INNOVIS HEALTH
106	DALLAS REGIONAL CHAMBER

	PLAN SPONSOR
107	DASCO PRO INC.
108	DETROIT LEGAL NEWS COMPANY
109	DICK BARKER INC.
110	DIRECT GENERAL CORPORATION
111	DON R. FRUCHEY, INC.
112	DONOHUE COMPANIES INC.
113	DOTT INDUSTRIES, INC.
114	DOWCO INC.
115	DURATEK FEDERAL SERVICES, INC.
116	E.D. BULLARD COMPANY
117	EAGLE-PICHER CORPORATION
118	EDEN STONE CO. INC.
119	EDISON ELECTRIC INSTITUTE INC.
120	EET CORPORATION
121	ELI LILLY
122	ELKAY MANUFACTURING COMPANY
123	ELMER'S PRODUCTS INC.
124	EMPIRE LEVEL MANUFACTURING CORP.
125	ENERCON ENGINEERING, INC.
126	ENERGY EAST CORP.
127	ENERGY NORTHWEST
128	EP LOYA GROUP, L.P.
129	ERICSSON INC.
130	ETHAN ALLEN GLOBAL INC.
131	E-S PLASTIC PRODUCTS INC.
132	FATHER FLANAGAN'S BOYS' HOME
133	FERRELL COMPANIES, INC.
134	FERRO CORP.
135	FISHER & COMPANY, INCORPORATED
136	FITCH, INC.
137	FIVE STAR DISTRIBUTING, INC.
138	FONTANESI & KAHN
139	FOREMOST FARMS USA
140	FOREST LABORATORIES, INC.
141	FLORIDA CHAMBER OF COMMERCE
142	FLORIDA GAS TRANSMISSION COMPANY
143	FLO-TORK, INC.

	PLAN SPONSOR
144	FOX CITIES CHAMBER OF COMMERCE & INDUSTRY
145	FRANK W. KERR COMPANY
146	FREEPORT MCMORAN / PHELPS DODGE CORP.
147	GARDNER DENVER, INC.
148	GERLIN, INC. DBA CORE PIPE PRODUCTS, INC.
149	GENERAC
150	GENERAL MILLS
151	GEO CONSULTANTS, LLC
152	GHP OPERATING COMPANY LLC (GLOBAL HOME PRODUCTS)
153	GILLETTE / PROCTER & GAMBLE
154	GLENMARK INDUSTRIES INC.
155	GPD, INC.
156	GREAT PLAINS ENERGY INCORPORATED
157	GREATER BINGHAMTON CHAMBER OF COMMERCE
158	GREATER GREENVILLE CHAMBER OF COMMERCE
159	GREATER JACKSON CHAMBER PARTNERSHIP
160	GREATER LOUISVILLE INC.
161	GREATER NEW HAVEN CHAMBER OF COMMERCE
162	GREATER PROVIDENCE CHAMBER OF COMMERCE
163	GREATER RALEIGH CHAMBER OF COMMERCE
164	GREATER READING CHAMBER OF COMMERCE/INDUSTRY
165	GREATER SCRANTON CHAMBER OF COMMERCE
166	GREATER TAMPA CHAMBER OF COMMERCE
167	GREATER TOPEKA CHAMBER OF COMMERCE
168	GREATER WACO CHAMBER OF COMMERCE
169	GREATER WASHINGTON BOARD OF TRADE
170	GREEN DIAMOND RESOURCE COMPANY
171	GREEN THUMB LAWNSCAPING, INC.
172	GRINDMASTER CORPORATION
173	GROESBECK LUMBER & SPPLY, INC.
174	GZA GEOENVIRONMENTAL, INC.
175	H&S TOOLS INC.
176	HALEY & ALDRICH INC
177	HAPAQ-LLOYD
178	HAMPTON ROADS CHAMBER OF COMMERCE
179	HARRIS PUBLICATIONS, INC.
180	HARTFORD CHAMBER OF COMMERCE

	PLAN SPONSOR
181	HARVEY M. ROSE ASSOCIATES, LLC
182	HASBRO INC.
183	HAYES LEMMERZ / HLI OPERATING COMPANY, INC.
184	HEALTH INSURANCE PLAN OF GREATER NEW YORK
185	HEART CITY AUTOMOTIVE, INC.
186	HFI, LLC
187	HIGH-TECH INSTITUTE, INC.
188	HIP ADMINISTRATORS OF FLORIDA, INC.
189	HILTON HEAD ISLAND CHAMBER OF COMMERCE
190	HITACHI AMERICA LTD
191	HOME DEPOT, INC.
192	HORNBERGER, SHEEHAN, FULLER & BEITER, INC.
193	HORNER ELECTRIC INC.
194	HOSPIRA INC.
195	HOSPIRA PUERTO RICO LLC
196	HP HOOD LLC
197	HUDSON, POTTS & BERNSTEIN L.L.P.
198	HUGHES HUBBARD & REED LLP
199	HUHTAMAKI AMERICAS, INC.
200	IDEARC, INC.
201	INDIANA DIMENSION, INC.
202	INDUSTRIAL STEEL INC.
203	INFINITY SYSTEMS ENGINEERING, LLC
204	INFINITY TECHNOLOGY SERVICES, LLC
205	INTERACTIVE DATA
206	INTERMET CORP
207	INTERNATIONAL PAPER COMPANY
208	INTERPUBLIC GROUP OF COMPANIES (IPG)
209	IPSOS AMERICA, INC.
210	J. HORST MANUFACTURING CO. INC.
211	JEFFERSON CHEVROLET CO.
212	JETRO CASH & CARRY ENTERPRISES, LLC
213	JOHN BURNS CONSTRUCTION COMPANY
214	JOHNSON & QUIN, INC.
215	JOHNSTOWN AREA REGIONAL INDUSTRIES, INC.
216	JSJ CORPORATION
217	KALAMAZOO REGIONAL CHAMBER OF COMMERCE

	PLAN SPONSOR
218	KALIL BOTTLING CO.
219	KEARFOTT GUIDANCE & NAVIGATION CORPORATION
220	KEATING OF CHICAGO, INC.
221	KELLY SERVICES INC.
222	KEY TRONIC CORPORATION
223	KULICKE & SOFFA INDUSTRIES, INC.
224	KEY ENERGY SERVICES, INC.
225	KEYSPAN ENERGY CORPORATION / NATIONAL GRID USA
226	KOCH INDUSTRIES, INC.
227	L.W. BARRETT CO., INC.
228	LAMERS BUS LINES, INC.
229	LAN-CON, INC.
230	LEE ENTERPRISES INC.
231	LEMAN USA INC.
232	LIBBEY INC.
233	LIGGETT GROUP INC.
234	LINDE HOLDINGS, LLC
235	LINDE GROUP / BOC GROUP
236	LITTLE ROCK REGIONAL CHAMBER OF COMMERCE
237	LOCHMANDY MOTOR SALES, INC.
238	LOUISIANA ASSOCIATION OF BUSINESS & INDUSTRY
239	MAGNETEK, INC.
240	MARIAN, INC.
241	MCDONALD'S CORP.
242	MCKENZIE MEMORIAL HOSPITAL
243	MCWILLIAMS ELECTRIC COMPANY INC.
244	M-D BUILDING PRODUCTS, INC.
245	MDM SERVICES CORPORATION
246	MEADOWBROOK DODGE, INC
247	MEMPHIS AREA CHAMBER OF COMMERCE
248	MERCHANTS MUTUAL INSURANCE COMPANY
249	METAL-ERA, INC.
250	METROPOLITAN TULSA CHAMBER OF COMMERCE
251	MIAMI-LUKEN, INC.
252	MIAMI VALLEY RESEARCH FOUNDATION
253	MICHIGAN CORPORATE SERVICES, LLC
254	MICHIGAN MAPLE BLOCK COMPANY

	PLAN SPONSOR
255	MIKE RAISOR PONTIAC, INC.
256	MILLBROOK EMPLOYEE LEASING CORP.
257	MINDPEARL (US) INC.
258	MIRAMED GLOBAL SERVICES, INC.
259	MITSUBA BARDSTOWN, INC.
260	MITSUBISHI MOTORS NORTH AMERICA, INC.
261	MITTAL STEEL USA INC. / ARCELORMITTAL
262	MODERN DROP FORGE CO.
263	MOOG INC.
264	MOORE FUNERAL HOME INC.
265	MOVADO GROUP INC.
266	NATIONAL DISTRIBUTING COMPANY, INC.
267	NATIONAL HEALTH SYSTEMS INC.
268	NATIONAL TANK COMPANY
269	NAVISTAR
270	NCL (BAHAMAS) LTD. D/B/A NCL
271	NEFF ENGINEERING CO, INC.
272	NETWORK EQUIPMENT TECHNOLOGIES INC.
273	NEWARK REGIONAL BUSINESS PARTNERSHIP
274	NEW CENTURY FINANCIAL CORP.
275	NEWPORT SERVICE CORP
276	NFT INCORPORATED
277	NORTHERN KENTUCKY CHAMBER OF COMMERCE
278	NOVARTIS / CIBA-GEIGY CORP.
279	NIBLOCK EXCAVATING, INC.
280	NORTH COAST DISTRIBUTING, INC.
281	NORTH COUNTRY MOBILE HOMES, INC.
282	ODESSA CHAMBER OF COMMERCE
283	ODESSA CHAMBER OF COMMERCE PROFIT SHARING
284	ODIN, FELDMAN, & PITTLEMAN, P.C.
285	O'DONNELL WICKLUND PIGOZZI AND PETERSON INC.
286	OKLAHOMA STATE CHAMBER OF COMMERCE
287	OLD DOMINION
288	OLMARC PACKAGING COMPANY
289	OLYMPUS CORPORATION OF THE AMERICAS
290	ORCHARD FIRST SOURCE CAPITAL, INC.
291	OREGON ANESTHESIOLOGY GROUP, P.C.

	PLAN SPONSOR
292	PACIFIC WESTERN TECHNOLOGIES, LTD.
293	PACKAGING CORPORATION OF AMERICA (PCA) (HOURLY)
294	PACKAGING CORPORATION OF AMERICA (PCA) (SALARIED)
295	PARAGON COMPUTER PROFESSIONALS, INC.
296	P-COR, LLC
297	PDC FACILITIES, INC.
298	PEARSON, INC.
299	PENSION PLAN OF THE GOVERNMENT EMPLOYEES HOSPITAL ASSOCIATION INC.
300	PENTON LEARNING SYSTEMS, L.L.C.
301	PEROT SYSTEM CORP.
302	PETERSEN ALUMINUM CORPORATION
303	PIPEFITTERS LOCAL NO. 636
304	POLSINELLI SHALTON WELTE SUELTHAUS P.C.
305	PRECISION CONTROL SYSTEMS OF INDIANAPOLIS, INC.
306	PRINT AND CONVERTING RESOURCES, LLC
307	PROCTER & GAMBLE CO.
308	PROCTER & GAMBLE SUBSIDIARIES
309	PROFESSIONAL PROJECT SERVICES, INC.
310	PROFESSIONAL X-RAY CENTER PC
311	R.A.P.E.L. INC.
312	RAIA PROPERTIES CORPORATION
313	REED & BARTON CORPORATION
314	RELIANCE GEAR CORPORATION
315	REPUBLIC NATIONAL DISTRIBUTING COMPANY
316	RESCAR COMPANIES
317	REYNOLDS & REYNOLDS
318	RICHMOND METROPOLITAN CONVENTION & VISITORS
319	ROBERT BOSCH
320	ROCK & BORGELT P.C.
321	ROGERS BROTHERS, INC.
322	ROHR-TIPPE MOTORS, INC.
323	ROPES & GRAY LLP
324	ROSE PRINTING SERVICES, INC.
325	ROTHBERG, LOGAN AND WARSCO LLP
326	ROWLAND DESIGN, INC.
327	ROY O. MARTIN LUMBER COMPANY, LLC

	PLAN SPONSOR
328	RUSSELL STOVERS CANDIES, INC.
329	RYDER SCOTT CO. L.P.
330	S.E.L., INC.
331	SAFETY AND ECOLOGY CORPORATION
332	SAFETY VISION, L.P.
333	SALINA AREA CHAMBER OF COMMERCE
334	SALT RIVER PROJECT AGRICULTURAL IMPROVEMENT AND POWER DISTRICT
335	SANTA CLARA CHAMBER OF COMMERCE
336	SCHIFF NUTRITION GROUP, INC.
337	SCHWARZ PAPER COMPANY
338	SCHWAN SHARED SERVICES, LLC
339	SCOTTSDALE CONVENTION & VISITORS BUREAU
340	SHAW ENVIRONMENTAL, INC.
341	SHREVEPORT CHAMBER OF COMMERCE
342	SEARLES VALLEY MINERALS
343	SELECT INTERNATIONAL CORP.
344	SEMITOOL, INC.
345	SHAKLEE CORPORATION
346	SIEMANS PERSONNEL, LLC
347	SIMPSON INVESTMENT COMPANY
348	SKAFF CARPET AND FURNITURE CO.
349	SOUTHERN UNION COMPANY
350	SPERION CORPORATION
351	SPOKANE REGIONAL CHAMBER OF COMMERCE
352	SPRINGFIELD AREA CHAMBER OF COMMERCE
353	SPRINGFIELD CONVENTION & VISITORS BUREAU, INC
354	SPRINGS INDUSTRIES INC.
355	SPRINGS WINDOW FASHIONS, LLC
356	SR. CARE CENTERS MANAGEMENT, LLC
357	SSW HOLDING COMPANY, INC.
358	ST. LANDRY PARISH SOLID WASTE DISPOSAL DISTRICT
359	ST. LOUIS REGIONAL CHAMBER & GROWTH ASSOC
360	ST. JUDE MEDICAL, INC.
361	STANDARD MOTOR PRODUCTS, INC.
362	STANDARD PACIFIC CORP
363	STARK DEVELOPMENT BOARD

	PLAN SPONSOR
364	STAR MARKETS, LTD.
365	STATE BANK OF LIZTON
366	STEEL TECHNOLOGIES, INC.
367	STERLING HEIGHTS DODGE INC.
368	SUMMIT MEDICAL GROUP
369	SUPREME MACHINED PRODUCTS CO. INC.
370	SUSQUEHANNA PFALTZGRAFF CO.
371	SWISS INTERNATIONAL AIRLINES, LTD.
372	SWISS RE AMERICA HOLDING CORP.
373	SYNERGIS TECHNOLOGIES GROUP
374	SYPRIS SOLUTIONS, INC.
375	TACOMA-PIERCE COUNTY CHAMBER OF COMMERCE
376	TAYLOR CORP. INC.
377	TAYLOR, PORTER, BROOKS, & PHILLIPS LLP
378	TERREBONNE MOTOR COMPANY, INC.
379	TETRA TECH, INC.
380	TEXAS ENERGY ENGINEERS, INC.
381	TFE, INC.
382	TGW-ERMANCO INC.
383	THE BUSINESS COUNCIL OF FAIRFIELD COUNTY
384	THE CHAMBER, DAYTONA BEACH & HALIFAX AREA
385	THE FITZPATRICK COMPANY
386	THE L.D. KICHLER CO.
387	THE LOXCREEN COMPANY, INC.
388	THE MAYER ELECTRIC SUPPLY CO., INC
389	THE MERCO GROUP, INC.
390	THE NPD GROUP, INC.
391	THERMATOOL CORPORATION
392	TIMKEN CO. (SALARY)
393	TIMKEN CO. (UNION)
394	TITAN INTERNATIONAL INC.
395	TOSHIBA TUNGALOY AMERICA, INC.
396	TRACHTE INC.
397	THETA TECHNOLOGIES, INC.
398	THE TRANZONIC COMPANIES
399	TREDEGAR CORPORATION
400	TREE TOP, INC.

	PLAN SPONSOR
401	TRIVEST SERVICE CORPORATION
402	TRUSSAL AND COMPANY
403	TS TECH HOLDING CO.
404	UNITED BUSINESS MEDIA
405	UNITED MINE WORKERS OF AMERICA (UMWA)
406	UNITED STATES BRASS & COPPER
407	URS GROUP, INC.
408	USG CORP.
409	UTILITIES INC.
410	VALASSIS
411	VENTURE ENCODING SERVICE, LLC
412	VERITAS
413	VIASAT, INC.
414	VIJUK EQUIPMENT, INC.
415	VULCAN IRON WORKS
416	WALNUT CREEK CHAMBER OF COMMERCE
417	WASTREN, INC.
418	WESKEM, LLC
419	WHITE HOUSE MANUFACTURING CORP.
420	WILLIAMSBURG AREA CHAMBER OF COMMERCE
421	WILLIAMS FORM ENGINEERING CORPORATION
422	WILSON ELECTRIC COMPANY
423	WILSONS THE LEATHER EXPERTS
424	WINNEBAGO COLOR PRESS, INC.
425	WINNEBAGO INDUSTRIES, INC.
426	WINSTON HEAT TREATING, INC.
427	WORLD BANK
428	WSMS MID-AMERICA, LLC
429	WSMS-MK, LLC
430	YOKEM MOTORS, INC.
431	YORK COUNTY CHAMBER OF COMMERCE
432	YORK COUNTY ECONOMIC DEVELOPMENT

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Notice of Class Action Settlement and Fairness Hearing

If you are a participant or beneficiary of your employer's 401(k) retirement savings plan through which you invested in certain JPMorgan stable value funds, you may qualify for a payment from this class action settlement. This Notice is directed to participants who must file the enclosed proof of eligibility claim form because without your completed claim form, the Settlement Administrator will not have the necessary information to process your claim. If your employer's 401(k) plan is listed at the end of this Notice as a plan for which the Settlement Administrator lacks participant information, you are required to submit a claim form to receive a settlement distribution.

The Court has authorized this notice. This is not a solicitation from a lawyer. Neither you nor your retirement plan is being sued.

I. PLEASE READ THIS SETTLEMENT NOTICE CAREFULLY

The purpose of this Notice is to inform you the Court has given its preliminary approval to a proposed settlement (the "Settlement") of a class action brought by certain individuals whose 401(k) plan accounts included investments in the JPMorgan stable value funds. The action is entitled *In re: J.P. Morgan Stable Value Fund ERISA Litigation*, case no. 12-CV-2548 (the "Action"), currently pending before the Honorable Vernon S. Broderick of the United States District Court for the Southern District of New York (the "Court"). The Court has given its preliminary approval to the Settlement. You should read this notice carefully, because your legal rights are affected whether you act or do not act.

The Plaintiffs brought the Action alleging violations of the Employment Retirement Income Security Act ("ERISA"), concerning the way Defendants JPMorgan Chase & Co. and other JPMorgan entities ("Defendants" or "JPMorgan") managed the Class Members' 401(k) plan investments that were allocated to certain JPMorgan stable value funds.

JPMorgan denies all claims, and nothing in the Settlement is an admission or concession on JPMorgan's part of any fault or liability whatsoever.

In its March 31, 2017, Memorandum Opinion and Order, the Court certified a class and three subclasses of individuals who were participants or beneficiaries in their employer's 401(k) plans and had some of their investments allocated to a stable value fund managed by JPMorgan during the class periods. (The definition of the class and the class periods is set forth below in Section II, "Definition of the Class.") The names of the 401(k) plans through which Class Members allocated retirement assets to JPMorgan stable value funds are listed in Attachment 1 to this Notice.¹ Please review Attachment 1 and its instructions to see what kind of claim form you need to file. If you have any question about how to proceed, call the Settlement Administrator, provide the name of your employer or former employer's 401(k) plan and ask if you need to file a claim form. There are two types of claim forms: (1) the Former Participant Claim Form for participants in 401(k) plans for which the Settlement Administrator has sufficient participant data, and (2) the Proof of Eligibility Claim Form (enclosed as Attachment 2) for participants in 401(k) plans for which the Settlement Administrator does not have sufficient data.

A. The Settlement

As part of the Settlement, a fund of \$75,000,000 (the "Settlement Amount") has been established to resolve the Action. From that \$75,000,000 will first be paid any administrative expenses, taxes, tax expenses, Court-approved attorneys' fees and costs, Class Representative service awards, and other approved expenses of the litigation. Then, the remaining Settlement Amount (called the "Net Settlement Amount") will be allocated to Class Members according to

¹ Attachment 1 lists the plans which, according to information available at the time of the Settlement, offered a JPMorgan stable value fund during the class period. The plans identified on Attachment 1 may change based on the subsequent investigation of the parties.

the Plan of Allocation to be approved by the Court. Shortly after the Court preliminarily approved the Settlement, JPMorgan deposited the \$75,000,000 Settlement Amount in an interest-bearing Qualified Settlement Fund. Upon final approval of the Settlement by the Court, the interest accrued on the Settlement Fund will be added to the Settlement Amount in order to benefit the Class.

You must return a claim form by _____ to participate in the Settlement. (See answer to Question No. 6 below for more information.)

B. Statement of Attorneys' Fees and Costs in the Class Action

Co-Lead Class Counsel, and the firms assisting them, have devoted many hours to bringing this case and pursuing it for the past five-and-a-half years. During that time, they also have advanced costs for expert consulting services, substantial investigation, intensive document analysis, and other costs necessary to pursue the case. Co-Lead Class Counsel's motion for class certification was granted by the Court on March 31, 2017. Co-Lead Class Counsel successfully defended JPMorgan's petition for an immediate appeal of the Class Certification Order, which the Second Circuit denied. Co-Lead Class Counsel engaged in substantial investigation and analysis of the law and facts concerning the Action in opposing JPMorgan's motion for summary judgment. This work resulted in the monetary benefits provided in the Settlement. Co-Lead Class Counsel took the risk of litigation and have not been paid for any of their time or reimbursed for any of the costs that they have incurred during the more than five years that the Action has been pending before the Court. Co-Lead Class Counsel also have agreed to undertake the additional risk of paying some of the administrative costs of the settlement process if the Settlement is not approved.

Co-Lead Class Counsel will apply to the Court for payment of attorneys' fees and costs for their work in the case. Co-Lead Class Counsel will request fees not to exceed one-third of the \$75,000,000 Settlement Amount and will request reimbursement of litigation costs not to exceed

\$1,750,000. Any attorneys' fees and costs awarded by the Court to Co-Lead Class Counsel will be paid from the Qualified Settlement Fund. Co-Lead Class Counsel will not seek to receive any interest earned by the Qualified Settlement Fund, which will be added to the Net Settlement Amount.

As is customary in class action cases in which the Class Representatives have spent time and effort on the litigation, Co-Lead Class Counsel also will ask the Court to approve Service Award payments, not to exceed \$20,000, for each of the 12 Class Representatives who took on the risk of litigation, provided discovery, and committed to spend the time necessary to bring the case to conclusion. Their activities also included assisting in the factual development of the Action.

II. DEFINITION OF THE CLASS

You are deemed to be part of the Class and a participant in this Action if you fit into one or more of the class or subclass definitions below, unless you expressly exclude yourself from the Class in writing. (See answer to Question No. 8 below.)

By order dated March 31, 2017, the Court certified this case to proceed on behalf of a class defined as follows:

All participants of ERISA plans, as well as beneficiaries of those plans, who were invested directly or indirectly in any JPM Stable Value Fund that invested in the JPM Intermediate Bond Fund and/or the Intermediate Public Bond Fund between January 1, 2009 and December 31, 2010 and whose stable value fund investment performance underperformed the Hueler index or similar objective benchmark. Excluded from the Class are the jurists to whom this case is assigned, as well as their respective staffs; counsel who appear in this case, as well as their respective staffs, including experts they employ; the Defendants in this matter, as well as their officers and directors; any person, firm, trust, corporation, officer, director, or other individual or entity in which a Defendant has a controlling interest or that is related to or affiliated with any of the Defendants; and the legal representatives, agents, affiliates, heirs, successors-in-interest, or assigns of any such excluded party.

In addition, the Court certified three subclasses. The first certified subclass—the “SAIF Subclass”—is defined as follows:

All participants of ERISA plans, as well as beneficiaries of those plans, who were invested directly or indirectly in the JPM Stable Asset Income Fund (“SAIF”) from between January 1, 2009 and December 31, 2010 and whose stable value fund investment underperformed the Hueler Index or similar objective benchmark. Excluded from the Class are the jurists to whom this case is assigned, as well as their respective staffs; counsel who appear in this case, as well as their respective staffs, including experts they employ; the Defendants in this matter, as well as their officers and directors; any person, firm, trust, corporation, officer, director, or other individual or entity in which a Defendant has a controlling interest or that is related to or affiliated with any of the Defendants; and the legal representatives, agents, affiliates, heirs, successors-in-interest, or assigns of any such excluded party.

The second certified subclass—the “ACSAF/JP Morgan Stable Value Fund Subclass”—has a class period that begins on September 17, 2007. The ACSAF/JP Morgan Stable Value Fund Subclass is defined as follows:

All participants of ERISA plans, as well as beneficiaries of those plans, who were invested directly or indirectly in the American Century Stable Asset Fund [(“ACSAF”)] immediately before JPMAM took over the Fund and received its assets in the ACSAF/JPM Stable Value Fund on or about September 17, 2007 and continuing to December 31, 2010, and whose stable value fund investment underperformed the Hueler Index or similar objective benchmark. Excluded from the class are the jurists to whom this case is assigned, as well as their respective staffs; counsel who appear in this case, as well as their respective staffs, including experts they employ; the Defendants in this matter, as well as their officers and directors; any person, firm, trust, corporation, officer, director, or other individual or entity in which a Defendant has a controlling interest or that is related to or affiliated with any of the Defendants; and the legal representatives, agents, affiliates, heirs, successors-in-interest, or assigns of any such excluded party.

The third certified subclass—the “Caterpillar Subclass”—is defined as follows:

All participants of the Caterpillar Plan, as well as beneficiaries of those plans, who were invested directly or indirectly in JPM’s Caterpillar Stable Principal Fund or any other JPM Stable Value Fund that invested in the Intermediate Bond Fund and / or the Intermediate Public Bond Fund between January 1, 2009 and December 31, 2010 and whose stable value fund investment performance underperformed the Hueler index or similar objective benchmark. Excluded from the class are the jurists to whom this case is assigned, as well as their respective staffs; counsel who appear in this case, as well as their respective staffs, including experts they employ; the Defendants in this matter, as well as their officers and directors; any person, firm, trust, corporation, officer, director, or other individual or entity in which a Defendant has a controlling interest or that is related to or affiliated with any of the

Defendants; and the legal representatives, agents, affiliates, heirs, successors-in-interest, or assigns of any such excluded party.

The “objective benchmark” referenced in each of these definitions will be the Lehman Brothers Intermediate Aggregate Index (later renamed the Barclays Intermediate Aggregate Index) (hereafter the “Lehman/Barclays Intermediate Aggregate Index” or the “Benchmark”).

1. Why Did I Receive This Settlement Notice?

You received this Notice because (1) records received by Class Counsel show that you may have been a participant or beneficiary in a 401(k) plan and that your 401(k) plan account may have included investments in a JPMorgan stable value fund, and you therefore may be part of the Class or one of the Subclasses, as explained above; or (2) you requested this Notice through the Settlement Website because you may be part of the Class or one of the Subclasses, as explained above.

2. What Is The Class Action About?

In this Class Action, Plaintiffs principally allege that Defendants violated ERISA in two fundamental ways. First, Plaintiffs allege that JPMorgan managed Plaintiffs’ investments imprudently in violation of JPMorgan’s fiduciary duties, by causing its stable value funds to invest in two other JPMorgan funds, the Intermediate Bond Fund (“IBF”) and the Intermediate Public Bond Fund (“IPBF”), which, in turn, invested in risky, highly leveraged assets, including, among other things, mortgage-related assets. Second, Plaintiffs allege that certain Defendants, as fiduciaries for the relevant plans and their participants and beneficiaries, breached their obligations under ERISA to comply with the duties of prudence and diversification and to discharge their duties solely in the interests of plan participants and beneficiaries, and for the exclusive purpose of providing benefits to the plan participants and beneficiaries. Plaintiffs also claim that certain Defendants engaged in transactions prohibited by ERISA, and the ACSAF/JPM Stable Value Fund Subclass Plaintiffs make additional claims against all Defendants for engaging in transactions prohibited by ERISA.

While none of the Plaintiffs or Class Members lost any of the money they invested in JPMorgan stable value funds, the Plaintiffs alleged that they were damaged because the investment return paid to Class Members would have been greater if the funds had been prudently managed.

Defendants have denied and continue to deny the claims and contentions of the Class Representatives. Defendants deny that they are liable at all to the Class, and that the Class has suffered any harm or damage for which Defendants could or should be held responsible. Nothing in the Settlement Agreement is an admission or concession on Defendants’ part of any fault or liability whatsoever.

3. Why Is There A Settlement?

The Court has not reached a final decision on the merits of the Class Representatives' claims. Instead, a majority of the Class Representatives (the "Settling Class Representatives") and Defendants have agreed to the Settlement. The Settlement is the product of extensive negotiations between Co-Lead Class Counsel and Defendants' counsel and an in-person mediation session with a private mediator, followed by months of further negotiation. The parties to the Settlement have taken into account the uncertainty and risks of litigation and have concluded that it is desirable to settle on the terms and conditions set forth in the Settlement Agreement.

[Objectors' Proposal - Four of the twelve Class Representatives do not approve of the settlement. Those four Class Representatives are represented by Philip Greenfield and Kirk May, German May PC, 1201 Walnut Street, 20th Floor, Kansas City, MO, 816-471-7700, www.germanmay.com.]

4. What Does The Settlement Provide?

The Net Settlement Amount will be allocated to Class Members according to a Plan of Allocation to be approved by the Court. Class Members fall into two categories: Current Participants and Former Participants, as defined on pages 2-3 above. Allocations to Current Participants who are entitled to a distribution under the Plan of Allocation will be made into their existing plan accounts in accord with their current investment elections. Allocations to Former Participants who are entitled to a distribution under the Plan of Allocation will be made by check mailed to their last known address or, if available and they so elect, as a rollover to a qualified retirement account.

In return for payment to the Class of the \$75,000,000 Settlement Amount, all Class Members will fully release the Defendants and the Released Parties from the Released Claims. The Released Parties include Defendants, any related entities, as well as any past attorneys and agents. The Released Claims include (but are not limited to) the following:

- All claims that were or could have been asserted in the Action, or that did or could arise out of the conduct alleged in the complaints filed in the Action.
- All claims that relate to any JPMorgan stable value fund investments, the holdings of any stable value fund investments, or disclosures regarding any stable value investments.
- All claims that relate to the direction to calculate, the calculation of, and/or the method or manner of allocation of the Net Settlement Fund pursuant to the Plan of Allocation.

This is only a summary of the Released Parties and Released Claims and is not a binding description of either. The governing releases are found within the Settlement Agreement at www.jpmsvfcclassaction.com. Generally, the release means that Class Members will not have the right to sue the Defendants or related parties for conduct during the Class Period arising out of or relating to the allegations in the Action.

The entire Settlement Agreement is available at www.jpmsvfcclassaction.com.

5. How Much Will My Distribution Be?

Because Class Counsel may not have received sufficient data from your employer's 401(k) plan, please review Attachment 1 and its instructions to see what kind of claim form you need to file. If you need to submit a Proof of Eligibility Claim Form, attached as Attachment 2 to this Notice, the amount, if any, that will be allocated to you will be based upon your Proof of Eligibility Claim Form and records, if any exist, that you provide from your 401(k) plan account. Calculations regarding the individual distributions will be performed by the Settlement Administrator, whose determinations will be final and binding, pursuant to the Court-approved Plan of Allocation.

To be eligible for a distribution from the Net Settlement Amount, you must either be: (1) a member of the Class or one of the Subclasses, as defined in Section II above, who submitted a complete and satisfactory claim form by the deadline; or (2) a beneficiary, alternate payee, or attorney-in-fact of persons identified in (1) or (2).

Under the proposed Plan of Allocation, the Net Settlement Amount will be divided among all Class Members based upon the underperformance, if any, of each Class Member's JPMorgan stable value investment compared to the Lehman/Barclays Intermediate Aggregate Index. At the Fairness Hearing, the Court will be asked to approve this calculation process as part of the Plan of Allocation.

To make this allocation, the Settlement Administrator will first calculate the Individual Underperformance Amounts by comparing the underperformance, if any, of the JPM Stable Value Funds by comparing the crediting rate of the Plans the participants invested in, with a crediting rate derived from the Benchmark. If the calculation shows that a Plan did not experience any underperformance compared to the Benchmark then the participants in those Plans are not by definition Class Members because they did not suffer from any underperformance damages. For those Plans that experienced underperformance the second step will be for the Settlement Administrator to calculate the Individual Underperformance Amounts as the total dollar value amount by which each participant's individual investment in JPM Stable Value Funds underperformed the Benchmark during the relevant time periods. The specific method for calculating these amounts is detailed in the Settlement Agreement's Plan of Allocation. The sum of all Individual Underperformance Amounts is defined to be the "Total Underperformance Amount."

Once the Underperformance Amounts have been calculated, each Class Member's payment will be calculated by multiplying the Net Settlement Amount by the ratio of that Class Member's Individual Underperformance Amount to the Total Underperformance Amount. This will allow each individual Class Member to receive an allocation from the Net Settlement Amount proportional to the underperformance of his or her stable value investment compared with the underperformance of other Class Members' investments (all other things being equal). Plan of Allocation examples are available on the website, www.jpmsvfcclassaction.com.

Class Counsel and the Settlement Administrator must review information that you provide from your 401(k) plan account to determine whether your investments in JPMorgan stable value funds underperformed as compared to the Benchmark. Any information Class Counsel obtains will be treated confidentially under the Protective Order entered by the Court in this Action and will be used solely for purposes of determining if you are a Class Member entitled to payment under the terms of the Settlement.

If you need to submit a Proof of Eligibility Claim Form and cannot, to the best of your knowledge and belief, state on the Claim Form accompanying this Notice that you invested through your employer's 401(k) plan in a JPMorgan stable value fund investment offering at some point during the period January 1, 2009 through December 31, 2010, then you will not receive a distribution from the Settlement. Provided your claim is timely and you can swear that you were invested in a JPMorgan stable value fund during the class period, but where you no longer have records showing the balance in your JPMorgan stable value fund investment from your 401(k) plan account or cannot estimate the amounts of your investment in the class period, the Settlement Administrator will award you one-half of the average class member award for participants from plans where balance information was available, or where the Settlement Administrator acquires data bearing on the claim, in its discretion it may use the data to determine the amount of the distribution if any.

6. How Can I Receive My Distribution?

Because the Settlement Administrator may not have sufficient information from your employer's 401(k) plan, you may need to submit a claim form to determine eligibility for a Settlement distribution. Please review Attachment 1 and its instructions to see what kind of claim form you need to file. **In order to receive your distribution if you are eligible for one, you must return a valid and timely claim form received by the Settlement Administrator no later than Month 00, 0000. A Proof of Eligibility Claim Form is enclosed with this Notice as Attachment 2.**

7. When Will I Receive My Distribution?

The timing of the distribution of the Net Settlement Amount is conditioned on several events, including the Court's final approval of the Settlement and that approval being no longer subject to any appeal in any court. If there is an appeal of the final approval, it may take several years to resolve and the distribution of the Net Settlement Amount will be delayed until that process is complete. If the Settlement is approved by the Court, and there are no appeals, distribution of the Net Settlement Amount likely will occur in 2019.

Separately, there are provisions in the Settlement Agreement that allow the parties to terminate the Settlement under specific conditions. There will be no payments under the Settlement if the Settlement Agreement is terminated.

There will be no payment to you if the Settlement Administrator determines that (1) you did not invest in a 401(k) plan; (2) you did invest in a 401(k) plan, but the plan did not invest in the JPMorgan stable value investments; or (3) your individual JPMorgan stable

value investment did not suffer any Underperformance Amount when measured against the Benchmark.

If the amount you are allocated is less than the amount of the reasonable direct costs of processing and delivering your payment then no distribution will be made to you. For example, if your allocation is less than \$5 and the reasonable direct costs of processing the payment and delivery are greater than \$5, you would not be eligible to receive any payment under the Settlement.

8. Can I Get Out Of The Settlement?

Yes, you have the right to exclude yourself from the Class and give up the right to your share of the Settlement Amount. Note: if you exclude yourself from the Class, you may not have a right to bring your own lawsuit due to ERISA's six-year statute of repose. Class Counsel is of the opinion that ERISA's six-year statute of repose bars you from bringing your own lawsuit. You may consult your own lawyer to get advice on this issue at your own expense.

If you ask to be excluded, you won't have a right to receive a payment from the Settlement. You will also not be bound by any judgment of the Court or the terms of the Settlement Agreement, including the release of your potential claims. However, under the United States Supreme Court's ruling in *California Public Employees' Retirement System v. ANZ Securities Inc.*, No. 16-373, 582 U.S. __ (2017), your rights to prosecute any individual claims against the Defendants arising out of these transactions may have already expired due to ERISA's six-year statute of repose.

To ask to be excluded from this proceeding, you must send an "Exclusion Request" by letter, expressly stating that you want to be excluded from the Class in *In re: J.P. Morgan Stable Value Fund ERISA Litigation*. Be sure to include your name and address, and sign the letter. You must mail your Exclusion Request, postmarked by Month 00, 0000, to the Settlement Administrator at the following address:

JPM Stable Value Fund Litigation
c/o JND Class Action Administration
P.O. Box 91304
Seattle, WA 98111

9. Do I Have A Lawyer In The Case?

The Court has appointed The Law Offices of Michael M. Mulder and Schneider Wallace Cottrell Konecky Wotkyns LLP to represent the Class as Co-Lead Class Counsel. Co-Lead Class Counsel are working jointly with and being assisted by the law firms of Levin Papantonio Thomas Mitchell Rafferty & Proctor, P.A; and Peiffer Rosca Wolf Abdullah Carr & Kane, APLC. If you want to be represented by your own lawyer, you may hire one at your own expense.

10. How Will The Lawyers Be Paid?

Co-Lead Class Counsel will file a petition for the award of attorneys' fees and costs. This petition will be considered at the Fairness Hearing. Co-Lead Class Counsel has agreed to limit their application for an award of attorneys' fees and costs to not more than \$25,000,000 in fees and \$1,750,000 in costs. The Court will determine what fees and costs will be approved.

11. How Do I Tell The Court If I Don't Like The Settlement?

If you are a Class Member, you can tell the Court that you do not agree with the Settlement or some part of it. To object, you must send the Court a written statement that you object to the Settlement in *In re: J.P. Morgan Stable Value Fund ERISA Litigation*, Case No. 12-cv-02548. Be sure to include your name, address, telephone number, signature, and a full explanation of why you object to the Settlement. Your written objection must be mailed to each of the following addressees and received by the Court no later than XXXXXXX, 2019.

THE COURT	CLASS COUNSEL	<u>[Objectors' Proposal – COUNSEL FOR FOUR CLASS REPRESENTATIVES]</u>
Clerk of the Court United States District Court Southern District of New York, Daniel Patrick Moynihan United States Court House 500 Pearl Street, New York, New York 10007	Schneider Wallace Cottrell Konecky Wotkyns LLP Attn: JPM Stable Value Fund ERISA Litigation 2000 Powell Street, Suite 1400 Emeryville, California 94608 counsel@jpmsvfclosion.com Tel: 1-844-877-5925	<u>German May PC</u> <u>1201 Walnut Street</u> <u>20th Floor</u> <u>Kansas City, MO 64106</u> <u>Attn: JPM Stable Value Fund</u> <u>ERISA Litigation]</u>

12. When And Where Will The Court Decide Whether To Approve The Settlement?

The Court will hold a Fairness Hearing at the U.S. District Court, 500 Pearl Street, New York, NY 10007. The Court has not yet scheduled the specific day and time of that hearing, but under the terms of the Settlement Agreement, it will occur after _____, 20___. When the Fairness Hearing is scheduled by the Court, information regarding the hearing will be posted on the website for the Settlement at www.jpmsvfclosion.com.

At the Fairness Hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are objections by Class Members, the Court will consider them. After the Fairness Hearing, the Court will decide whether to give its final approval to the Settlement. The Court also will consider the petition for Class Counsel's attorneys' fees and costs and any service awards to Class Representatives.

13. Do I Have To Attend The Fairness Hearing?

No, but you are welcome to come at your own expense. If you send an objection, you do not have to come to the Court to talk about it. As long as you have timely objected, the Court will consider it when the Court considers whether to approve the Settlement as fair, reasonable and adequate. You also may pay your own lawyer to attend the Fairness Hearing, but such attendance is not necessary.

14. May I Speak At The Fairness Hearing?

If you are a Class Member, you may ask the Court for permission to speak at the Fairness Hearing. To do so, you must send a letter or other paper called a “Notice of Intention to Appear at Fairness Hearing in *In re: J.P. Morgan Stable Value Fund ERISA Litigation*, Case No. 12-cv-02548.” Be sure to include your name, address, telephone number, and your signature. Your Notice of Intention to Appear must be mailed to Class Counsel [\[Objectors’ Proposal - and Counsel For Four Class Representatives\]](#) and filed with the Clerk of the Court no later than **XXXXX, 2019**. (Your notice must be mailed to each of the addressees listed in the answer to Question No. 11).

Please note that only Class Members may speak at the Fairness Hearing. If you have chosen to exclude yourself from the Settlement, you are no longer a member of the Settlement Class and may not speak at the Fairness Hearing.

15. What Happens If I Do Nothing At All?

If you are a Class Member, and you do nothing, you will be bound by the Settlement as described above in this Settlement Notice if the Settlement is finally approved, **BUT YOU WILL NOT RECIEVE ANY MONEY. THE ONLY WAY TO RECEIVE ANY MONEY IS TO FILE A CLAIM FORM NO LATER THAN XXXX, 2019.** (See Question No. 6.)

16. How Do I Get More Information?

This Settlement Notice does not fully describe all of the claims, defenses, or contentions of the parties. If you have questions about this Notice or the Action, please do not contact the Court. If you have questions regarding the Settlement, you can call Class Counsel at 1-844-877-5925, email Class Counsel at counsel@jpmsvfclassaction.com, [\[Objectors’ Proposal - call Counsel For Four Class Representatives at 816-471-7700, email Counsel For Four Class Representatives at philg@germanmay.com or kirkm@germanmay.com.\]](#) call the Settlement Administrator at 1-844-877-5911, write to the Settlement Administrator at JPM Stable Value Fund Litigation c/o JND Class Action Administration, P.O. Box 91304, Seattle, WA 98111, or go to the following website: www.jpmsvfclassaction.com where you will find the Court’s order certifying the Class, the Plaintiffs’ Consolidated and Amended Complaint, the Defendants’ Answer to the Consolidated and Amended Complaint, the Settlement Agreement, and information regarding the day, time, and location of the Fairness Hearing once it has been scheduled by the Court. Other filings with the Court and information regarding the Settlement are also available online [\[Objectors’ Proposal - or from the counsel noted above.\]](#).

Dated: _____, 2018

BY THE ORDER OF THE UNITED STATES
DISTRICT COURT FOR THE SOUTHERN
DISTRICT OF NEW YORK

ATTACHMENT 1:
LIST OF PLANS REQUIRING ADDITIONAL INFORMATION

INSTRUCTIONS:

- Identify the 401(k) Plan you invested in from table below. Please note the plans listed are only the plans where the Settlement Administrator has no information or may have insufficient information to determine a participant's eligibility for a distribution from the Settlement.
- If you find the 401(k) plan you invested in at any time from 2009 through 2010 in the table below, you need to submit a Proof of Eligibility Claim Form (Attachment 2).
- If you do not see your plan in the table below, go to the Settlement Website to find the complete list of employer 401(k) plans involved in this case.
- If you are not sure of what to do, you should call the Settlement Administrator at 1-844-877-5911.

1.	1888 Mills, LLC
2.	A.A. Anderson Co., Inc.
3.	Aggreko, LLC
4.	Ajax Paving, Inc.
5.	Ajax Paving of Florida, Inc.
6.	American Civil Constructors, Inc.
7.	Angelo Iafrate Construction Co
8.	Angelo's Aggregate Materials, Ltd.
9.	Anna Trucking L.L.C.
10.	Area Energy & Electric, Inc.
11.	Arizona Chemical Company
12.	Arlington Metals Corporation
13.	Audio Authority Corporation
14.	Augusta Newsprint Company
15.	Badgerland Supply. Inc.
16.	Baesman Printing Corporation
17.	Bank of Commerce
18.	Bank of Commerce & Trust Company
19.	Beechmont Press, LLC
20.	Bell Corp.
21.	Benesys, Inc.
22.	Bernard, Cassisa, Elliott and Davis APLC
23.	Bigston Corporation

24.	Brook Furniture Rental Inc.
25.	Bunn-O-Matic Corporation
26.	Carr, Inc.
27.	Cincinnati Tool Steel Company
28.	Clasen Quality Coatings, Inc.
29.	Cole Hardwood Inc.
30.	Conning & Company
31.	Cooperative Regions of Organic Producer Pools Cooperative, Inc. (CROPP)
32.	DACO Incorporated
33.	Dasco Pro Inc.
34.	Dental Arts Lab
35.	Detroit Legal News Company
36.	Dick Barker Inc.
37.	Direct General Corporation
38.	Don R. Fruchey, Inc.
39.	Dott, Inc.
40.	Dowco Inc.
41.	E&T Plastics
42.	E.D. Bullard Company
43.	Elkhart Brass Manufacturing
44.	Enercon Engineering, Inc.
45.	E-S Plastic Products Inc.
46.	Fasig-Tipton
47.	Frank W. Kerr Company
48.	Gerlin, Inc. dba Core Pipe Products, Inc.
49.	Glenmark Inc.
50.	GPD Inc
51.	Green Thumb Landscaping, Inc.
52.	Grindmaster Corporation
53.	Harvey M. Rose Associates, LLC
54.	HFI, LLC
55.	High-Tech Institute, Inc. - Anthem Education Group 401(K) Plan (High Tech)
56.	Hornberger, Sheehan, Fuller & Beiter, Inc.
57.	Horner Electric Inc.
58.	Hudson, Potts & Bernstein
59.	Indiana Dimension, Inc.
60.	Industrial Steel Inc.
61.	Infinity Systems Engineering, LLC

62.	Infinity Technology Services, LLC
63.	J. Horst Manufacturing Co. Inc.
64.	Jetro Cash & Carry , LLC
65.	John Burns Construction Company
66.	Johnson & Quin, Inc.
67.	Kalil Bottling Co.
68.	Keating of Chicago, Inc.
69.	Kriete Group
70.	Lamers Bus Lines, Inc.
71.	Leman USA Inc.
72.	Linde Holdings, LLC
73.	Lochmandy Motor Sales, Inc.
74.	Marian, Inc.
75.	McKenzie Memorial Hospital
76.	McWilliams Electric Company Inc.
77.	Meadowbrook Dodge, Inc
78.	Metal-Era, Inc.
79.	Miami-Luken, Inc.
80.	Michigan Maple Block Company
81.	Mike Raisor Pontiac, Inc.
82.	Millbrook Employee Leasing Corp.
83.	Mindpearl (US) Inc.
84.	MiraMed Global Services, Inc.
85.	Mitsuba Bardstown, Inc.
86.	Moore Funeral Home Inc.
87.	National Health Systems Inc. - Hill Group Retirement Plan
88.	Neff Engineering Co, Inc.
89.	Newman Equipment
90.	New Century Financial corp.
91.	Newport Service Corp
92.	North Country Mobile Homes, Inc.
93.	Odin, Feldman, & Pittleman
94.	Olmarc Packaging Company
95.	Orchard First Source Capital, Inc.
96.	Paragon Computer Professionals, Inc.
97.	PDC Facilities, Inc.
98.	PDS
99.	Penton Learning Systems, L.L.C.

100.	Petersen Aluminum Corporation
101.	Precision Control Systems of Indianapolis, Inc.
102.	Print and Converting Resources, LLC
103.	Professional X-Ray Center
104.	Provost Umphrey
105.	R.A.P.E.L. Inc.
106.	Raia Properties Corporation
107.	Rock & Borgelt
108.	Rogers Brothers, Inc.
109.	Rose Printing Services, Inc.
110.	Rothberg, Logan and Warsco
111.	Rowland Design, Inc.
112.	S.E.L., Inc.
113.	Safety Vision
114.	Schiff Nutrition Group, Inc.
115.	Schwarz Paper Company
116.	Select International Corp.
117.	Shaklee Corporation
118.	Siemans Personnel, LLC
119.	Skaff Carpet and Furniture Co.
120.	SSW Holding Company, Inc.
121.	Sr. Care Centers Management, LLC
122.	St. Landry Parish Solid Waste Disposal District
123.	Standard Pacific Corp
124.	State Bank of Lizton
125.	Sterling Heights Dodge Inc.
126.	Supreme Machined Products Co. Inc.
127.	Synergis Technologies Group
128.	Terrebonne Motor Company, Inc. - Barker Automotive Family Savings
129.	Texas Energy Engineers, Inc.
130.	TGW-Ermanco Inc.
131.	The Fitzpatrick Company
132.	The L.D. Kichler Co.
133.	The Merco Group, Inc.
134.	Thermatool Corporation
135.	Trachte Inc.
136.	Trivest Service Corporation
137.	TRUSSAL AND COMPANY

138.	United States Brass & Copper
139.	Utilities Inc.
140.	Venture Encoding Service, LLC
141.	Vijuk Equipment, Inc.
142.	Vulcan Iron Works
143.	White House Manufacturing Corp.
144.	Williams Form Engineering Corporation
145.	Wilson Electric Company
146.	Winnebago Color Press, Inc.
147.	Winston Heat Treating, Inc.
148.	Yokem Motors, Inc.

Exhibit B

Litigation Settlement Timeline

Event	Deadline
Notice shall be provided to the Class	May 30, 2019
Plaintiffs apply to Court for attorney's fees and costs	June 19, 2019
Deadline for requests for exclusion to be submitted	July 9, 2019
Objections by Class Members to Settlement	July 9, 2019
Deadline for appearance of counsel regarding objections	July 9, 2019
Deadline for any party to file with the Court a response to an objection by a Class Member	August 8, 2019
Plaintiffs shall timely file a memorandum in support of final approval	August 8, 2019
Either Defendants or Class Counsel may, in their sole and absolute discretion, terminate the Settlement Agreement by delivering a notice of termination to the other party	August 27, 2019
Fairness Hearing	September 6, 2019 at 11:00 a.m.